



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

**Central District Office**

TELE: (614) 728-3778 FAX: (614) 728-3898  
www.epa.state.oh.us

**MAILING ADDRESS:**

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

August 22, 2007

**Re: Intelligrated Products LLC  
(FKA) Versa LLC  
OHR000111807  
CESQG  
Notice of Violation**

Mr. Mike Payne  
Intelligrated Products LLC  
475 East High Street  
PO Box 899  
London, OH 43140

Dear Mr. Payne:

On August 15, 2007, Ohio EPA, Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection at the Intelligrated Products LLC (IP) facility located at 475 East High Street, London, Ohio to determine the facility's compliance with Ohio's hazardous waste, used oil, and universal hazardous waste regulations as found in Chapter 3734. of the Ohio Revised Code and Chapter 3745. of the Ohio Administrative Code (OAC). You represented IP and I represented Ohio EPA during the inspection. We discussed facility operations and possible pollution prevention and/or recycling opportunities.

As a result of the compliance evaluation inspection, it was determined that IP violated the following used oil management rule as specified by the OAC:

**OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** Used oil generators that accumulate used oil in containers and aboveground tanks must clearly label or mark each container or tank with the words "Used Oil."

IP generates used motor oils from equipment maintenance and used cutting oils from manufacturing processes.

IP had containers of used oils marked with the words "Waste Oil" instead of the words "Used Oil" as stipulated by the OAC rule.

Please provide evidence that all containers used to manage used oil are appropriately labeled or marked (i.e., certification statement, photographs, etc.).

Also, please provide information regarding the management of any used batteries generated at the facility (i.e., lead acid batteries from forklifts, etc.). All of the requested information should be sent to my attention at the letterhead address within thirty (30) days of receipt of this letter.

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

Mr. Mike Payne  
Intelligrated Products LLC  
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As we discussed, this facility was formerly operated by Versa LLC, which requested and was given a hazardous waste generator identification number with a hazardous waste generator status as a small quantity generator. Currently the raw materials and subsequent usage methods result in little to no hazardous waste generation by IP. Therefore, I have updated the "RCRA Subtitle C Site Identification/Verification Form" (Enclosed) and notified Tammy McConnell, of DHWM's Central Office of these pending changes. I have identified IP as a conditionally exempt small quantity generator (i.e., generates from 0 to 220 pounds of hazardous waste in any month). This will keep the identification number in an active status should it become necessary for you to use it. I have also updated other portions of the form to better reflect the current facility operations and/or management (i.e., contact name spelling, property owner information, used oil generator, universal waste generator, etc.). Should you wish to change/update this form, please contact Tammy by telephone at (614) 644-2922 or by e-mail or regular mail at the addresses listed in the top left corner of the Site Identification/Verification Form.

Enclosed, please find a copy of the used oil checklist completed as a result of the compliance evaluation inspection. Also enclosed, please find the following list of Ohio EPA documents for your review:

- Small Business Environmental Compliance Self-Assessment Guide
- Identifying Your Hazardous Waste
- The Regulation of Use Oil: An Overview for Ohio Businesses Who Generate Used Oil
- Universal Waste
- Ohio's Universal Waste Rules: Are You Handling Used Lamps Correctly?
- Letter from November 18, 2002, regarding Waste Handling/Disposal of Aerosol Cans
- Example of Aerosol Can Puncturing Device (Please Note: this is not an endorsement for this specific product and/or manufacturer)

Should you have any questions or need additional information, I can be reached at the letterhead address or by telephone at (614) 728-5037.

NOTICE: Failure to list specific deficiencies or violations in this letter does not relieve IP from having to comply with all applicable regulations.

Respectfully,



Randy Sheldon  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

Enclosures

c: Tammy McConnell, DHWM/CO  
DHWM/CDO File

E-mail this completed form to [tammy.mccconnell@epa.state.oh.us](mailto:tammy.mccconnell@epa.state.oh.us) or mail it to Tammy McConnell, Central Office

**U.S. Environmental Protection Agency  
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHR000111807								
3. Site Name	Name: Intelligrated Products LLC						Website (optional:)		
4. Site Location Information	Street Address: 475 East High Street, PO Box 899								
	City, Town, or Village: London				State: OH				
	County Name: Madison				Zip Code: 43140				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	A.			B.					
	C.			D.					
	7. Facility Representative:				MI:	Last Name: Payne			
	First Name: Mike				Phone Number: 7404900258				Phone Number Extension:
Additional names can be recorded in number 12.  Only provide address information if it is different than the site address.	E-Mail Address: <a href="mailto:mike.payne@intelligrated.com">mike.payne@intelligrated.com</a>								
	Fax Number: 7404900282				Fax Number Extension:				
	Street or P.O. Box: 475 East High Street, PO Box 899								
	City, Town or Village: London								
	State: OH		Country: USA			Zip Code: 43140			
	8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):				
		London/HP LTD							
		Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State
		<input checked="" type="checkbox"/>							
Street or P.O. Box: c/o JP Management, LP 1825 Bell Street, #100									
City, Town, or Village: Sacramento			Owner Phone #:						
State: CA			Country: USA		Zip Code: 95825				
B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):						
Intelligrated Products LLC									
Operator Type: Mark with an X		Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>								
Street or P.O. Box: 475 East High Street, PO Box 899									
City, Town, or Village: London			Operator Phone #:						
State: OH			Country: USA		Zip Code: 43140				
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/>	Not Regulated								



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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

<b>A. Hazardous Waste Activities</b>																	
(choose only one of the following categories)																	
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste															
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste															
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace															
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption															
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption															
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility															
	<input type="checkbox"/>	7. Hazardous Waste Transporter															
<b>B. Universal Waste Activities</b>		<b>C. Used Oil Activities</b>															
<input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator															
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		2. Used Oil Transporter Indicate Type(s) of Activity(ies)															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste		<input type="checkbox"/> Transporter															
(accumulates 5,000 kg or more).		<input type="checkbox"/> Transfer Facility															
<input type="checkbox"/> 3. Destination Facility for Universal Waste		3. Used Oil Processor and/or Re-refiner															
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)															
		<input type="checkbox"/> Processor															
		<input type="checkbox"/> Re-refiner															
		<input type="checkbox"/> 4. Off-Specification Used Oil Burner															
		5. Used Oil Fuel Marketer -															
		Indicate Type(s) of Activity(ies)															
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil															
		<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															
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D. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>															
<p>11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%; height: 20px;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> </tr> </table>																	
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N	Containers?																
<p>13. Name of Inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)</p> <p>R. Sheldon _____ 08-15-2007, 11:00 AM</p>																	
<p>14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:35%;">Signature of owner, operator, or an authorized representative</td> <td style="width:35%;">Name and Title (Print)</td> <td style="width:30%;">Date (mm-dd-yyyy)</td> </tr> </table>			Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)												
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## FACILITY/PROCESS DESCRIPTION

### General Facility Information

Intelligrated Products LLC (IP) is located at 475 East High Street in London, Ohio 43140, Madison County. Originally, a hazardous waste identification number (OHR000111807) was issued to Versa LLC as a small quantity generator of hazardous wastes. In 2003, IP purchased this Versa LLC production facility (not the property owner). IP provides material handling solutions and services (conveyor manufacturer) for many businesses, warehouses, stores, etc. The equipment is built to customer specifications (color, size, abilities, etc.).

A new hazardous waste generator identification form has been completed to reflect the most current generator status and other associated information (company name, contact person, generator status, property owner, etc.) and submitted to Central Office for updating into RCRA Info. This updated form indicates that IP is a conditionally exempt small quantity generator of hazardous waste, a generator of used oil, and a generator of spent fluorescent lamps.

### Waste Generation and Management

The conveyor systems are mainly made of metal and/or aluminum parts (frames, rollers, etc.). The parts are stamped and manufactured to customer specifications at this facility. A five (5) step powder coating preparation process is used prior to coloring the materials (3 washes that includes 1 phosphate wash which are followed by 2 final rinses). These waters are directly plumbed to the publically owned/operated sanitary sewer system for disposal when spent. The cleaned parts are then put through the powder coating process and curing ovens. An overhead automated production line is used to carry the parts through this process. There are 5 colors available in the Sherwin Williams Powdura Hybrid Powder Coating product, all which have been determined to be non-hazardous waste when appropriately used. Safety-Kleen manages these wastes for IP as a non-hazardous solid waste.

There are 4 Safety-Kleen "distillation" parts washers used by IP (see brochure). These parts washers are topped with Safety-Kleen's Premium Gold Solvent when needed due to use and/or evaporation. These distillation/recycle units provide clean solvent as needed by refreshing the solvent through the distillation process. When the determination is made that the solvent is not adequately performing, the distillation cycle is started and the solvent reservoir automatically pumps cleaned solvent back into the basin with 4 minutes of initiation. We discussed that if a sludge was generated from the distillation process, it could be placed into the used oil generated by IP due to the generator status of the facility.

Used oils are generated by IP from different processes. General equipment maintenance (i.e., production machines, forklifts, etc.) and/or the production processes (i.e., cutting, drilling, stamping, grinding of metals) are the main sources of the used oils. Safety-Kleen



manages all of the used oil for IP. Containers of used oils were labeled with the words "waste oil" inappropriately at the time of the inspection. The facility representative was notified that the labeling on these had to be changed to present the words "used oil."

Recycling of plastics, aluminum, and scrap metals are currently in process. The facility was informed that when they reach 2,000 pounds of used cardboard per month this will also become a viable recycling option, a monthly total which IP has just recently reached.

Safety-Kleen brake cleaner in aerosol cans is used for spot cleaning of equipment during maintenance procedures. It was reported that, although most of the sprayed product evaporates, care is taken when using this product to not allow any excess product to be spread about. These cans are reportedly used to empty before disposing of them. We discussed use of an aerosol can puncturing device that would also contain any unused product and/or aerosol propellant. The container with the puncturing device should be managed as a hazardous waste satellite accumulation container. Upon completion of the puncturing, the aerosol can could then be recycled as scrap metal.

Some touch-up painting is completed by use of spray paint in aerosol cans. These cans are reportedly used to empty before disposing of them. We discussed use of an aerosol can puncturing device that would also contain any unused product and/or aerosol propellant. The container with the puncturing device should be managed as a hazardous waste satellite accumulation container. Upon completion of the puncturing, the aerosol can could then be recycled as scrap metal.

Cintas launders used rags for IP.

Used mainly in the office areas only, there were no spent fluorescent light bulbs in accumulation at the time of the inspection. We discussed appropriate use and/or management of fluorescent light bulbs.

Per telephone call on the same day as the inspection, the facility representative was asked to provide details regarding the management of any used batteries generated. To date, this information has not been provided.



## USED OIL INSPECTION CHECKLIST (Short Version)

**NOTE:** *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

### PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes \_\_\_ No  N/A  RMK# \_\_\_
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes \_\_\_ No  N/A \_\_\_ RMK# 1

### USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
5. Does the generator of a 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 \_\_\_ No  N/A \_\_\_ RMK# 2
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_



7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A \_\_\_RMK#\_\_\_
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes \_\_\_ No  N/A \_\_\_RMK#\_ 3
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A \_\_\_RMK#\_\_\_
- b. Contained the release? Yes  No  N/A \_\_\_RMK#\_\_\_
- c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A \_\_\_RMK#\_\_\_
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A \_\_\_RMK#\_\_\_
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes \_\_\_ No  N/A  RMK#\_\_\_
- b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes \_\_\_ No  N/A  RMK#\_\_\_
- c. Are the combustion gases from heater vented to the ambient air? Yes \_\_\_ No  N/A  RMK#\_\_\_



11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes  No  N/A  RMK#

### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes  No  N/A  RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A  RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes  No  N/A  RMK#

### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes  No  N/A  RMK#

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### REMARKS

1. The used oil is not burned.
2. Reportedly, halogen containing products/wastes are not mixed with used oils.
3. Containers of used oil were not appropriately labeled with the words "used oil."



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