



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) 726-3778 FAX: (614) 726-3898
www.epa.state.oh.us

MAILING ADDRESS:

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

November 24, 2009

Mr. Gilbert Mayo, V.P. Operations
STAHL – a Scott Fetzer company
3201 W. Old Lincoln Way
Wooster, OH 44691

**Re: STAHL – a Scott Fetzer company
OHD004287355
Morrow County
Notice of Violation**

Dear Mr. Mayo:

On November 5, 2009, Ohio EPA conducted a compliance evaluation inspection (CEI) at the STAHL – a Scott Fetzer company (Stahl) facility located at 201 Cunnard Street in Cardington, Ohio, Morrow County. The purpose of the CEI was to determine the facility's compliance with Ohio's hazardous waste management rules and regulations as found in Chapter 3745. of the Ohio Administrative Code (OAC) and Chapter 3734. of the Ohio Revised Code. During the CEI, Stahl was represented by Mr. Terry Hunter and I represented Ohio EPA. The CEI consisted of a review of facility operations and associated documentation. We also discussed the merits of pollution prevention.

Based on the results of the CEI, it has been determined that Stahl has violated at least the following rules as found in the OAC:

- OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must determine if that waste is a hazardous waste. The generator may use analytical testing, generator knowledge, and/or a combination of analytical testing applied with generator knowledge.

At the time of the CEI, no information regarding the content of the wash water generated from the *Fremont Cleaning Systems* and subsequent management/disposal of the waste wash water could be provided.

Stahl must provide a waste determination regarding this wash water in conjunction with the management and/or disposal methods used. A return to compliance or citing of additional violations will be determined, based upon the results of this waste evaluation. Please send your evaluation and management/disposal methods for this waste stream to my attention for review.

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

2. **OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:** A generator of hazardous waste may accumulate as much as fifty-five (55) gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit provided he marks his containers either with the words "hazardous waste" or with other words that identify the contents of the containers.

At the time of the CEI, the hazardous waste satellite accumulation container located in the paint booth in Building #2 was not appropriately labeled.

In my presence, this container was labeled with the words "hazardous waste." As this has been a continuing problem at this facility, Stahl must supply detailed information on the methods to be used to assure continued compliance with this rule.

3. **OAC Rule 3745-66-73(A), Management of Containers:** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

At the time of the CEI, the hazardous waste satellite accumulation container located in the paint booth in Building #2 was not closed. The lid on the self-closing funnel device in the large bung of the container could not close due to the presence of a smaller container placed in the funnel compartment.

In my presence, the small container was removed and the satellite accumulation container was appropriately closed. As this has been a continuing problem at this facility, Stahl must supply detailed information on the methods to be used to assure continued compliance with this rule.

4. **OAC Rule 3745-52-41, Annual Report:** A large quantity generator who ships any hazardous waste off-site must prepare and submit to Ohio EPA the "Annual Hazardous Waste Report" by March first of each year. The report must be presented on the Ohio EPA prescribed forms. The report must cover generator activities during the previous year and all other required information prescribed by this rule.

During calendar year 2008, per hazardous waste manifests provided, Stahl was a large quantity generator of hazardous waste for calendar year 2008 requiring the submittal of an "Annual Hazardous Waste Report" to Ohio EPA.

On November 16, 2009, Stahl submitted the "Annual Report" to Ohio EPA as required. As submittal of this report to Ohio EPA in a timely manner has been a continuing problem for this facility, Stahl must provide for my review detailed information on the methods to be used to assure this report is submitted as required.

Mr. Gilbert Mayo, V.P. Operations
STAHL – a Scott Fetzer company
Page 3 of 3

Also, please provide information to my attention regarding the management of spent fluorescent light bulbs from this facility. All requested information should be sent to my attention at the letterhead address within thirty (30) days of receipt of this letter. Upon receipt of the requested information, a hazardous waste generator status determination will be completed. After the facility's generator status has been determined, all applicable inspection checklists and Stahl's compliance with all applicable rules will be finalized.

Should you have any questions, I can be reached by telephone at 614-728-5037.

NOTICE: Ohio EPA's failure to list specific violations or deficiencies in this letter does not relieve Stahl from having to comply with all applicable regulations.

Respectfully,



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

Enclosure

c: Kristina Durnell, DHWM/CO
Mary Ann Silagy, DHWM/CO
DHWM/CDO/Elte

RS/nsm NOV



Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
 or mail it to Kristina Durnell, Central Office

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: ohd004287355 Name: stahl - a scott fetzer company Website: (Optional) Street Address: 201 cunnard street City, Town, or Village: cardington County Name: morrow State: OH Zip Code: 43315 Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: gilbert MI: Last Name: mayo Phone Number: 330-264-7441 Phone Number Extension: 622 E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: 3201 w old lincoln way City, Town or Village: wooster State: oh Zip Code: 44691
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	Name of Site's Legal Owner: stahl - a scott fetzer company Owner Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Type: Street or P.O. Box: 28800 clemens road City, Town or Village: westlake State: oh Date Became Owner (mm/dd/yyyy): Owner Phone #: 330-264-7441 Country: usa Zip Code: 44145 Name of Site's Operator: stahl - a scott fetzer company Operator Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Type: Street or P.O. Box: 3201 w old lincoln way City, Town or Village: wooster State: oh Date Became Operator (mm/dd/yyyy): Operator Phone #: 330-264-7441 United States Zip Code: 44691

VIOLATIONS CITED? Yes No

TYPE OF HANDLER— A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the 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.

d001 f003 f003

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives: terry hunter
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: Generator status cannot be determined at this time due to 52-11 violation. Information left blank (i.e., dates) will be completed upon confirmation as discrepancies have been found within previous submittals.
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
r sheldon		11/5/2009 10:30 am

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.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

FACILITY INFORMATION – PROCESS DESCRIPTION

General Information

STAHL, a Scott Fetzer company, (Stahl) was established in 1946. Stahl is a manufacturer of service bodies, dump bodies, utility van bodies, stake bodies, toolboxes, cranes, and truck accessories for various trucks and vans. Stahl has a network of distributors and/or manufacturing plants throughout the United States. A sister manufacturing plant is located in Wooster, OH. This Stahl facility is located at 201 Cunnard Street in Cardington, OH, Morrow County and consists of two (2) buildings (#1, #2). Hazardous waste generator identification number OHD004287355 was issued to this facility on October 29, 1986.

This facility is currently experiencing a slow manufacturing period and is currently down from approximately 132 employees to approximately 15. Most of the painting is being completed at the Wooster, OH facility. Powder coating has now resumed at the Cardington facility. All metal fabrication is completed in-house and includes functions such as shearing, punching, laser cutting, bending, turn welding, washing with a *Fremont Cleaning System*, drying, and undercoating.

Building #2 has three (3) paint booths. At this time only two (2) of the paint booths are used for painting, while the other one is used for washing the items. The *Fremont Cleaning System*, a power washing system with manufacturer supplied product, is used in the other paint booth. Floor drains in the paint booth capture the wash waters and is pumped to a holding tank. This water is then taken off-site for disposal. A single hazardous waste satellite accumulation area is located in the paint booth area.

Building #1 is currently used for powder coating. As with Building #2, a paint booth is used for cleaning the items to be powder coated. A *Fremont Cleaning System* is also used here in the same manner. A former <90 day hazardous waste accumulation area was located in the northwestern end of this building (#1) and to date has not undergone generator closure.

The current <90 day hazardous waste accumulation area is a portable structure specifically designed for hazardous waste/hazardous materials management. This building is constructed to manage explosions and contain spills. It is also equipped with a built-in fire suppression system. There was a single drum of hazardous waste in accumulation at the time of the inspection.

Waste Management

Hazardous wastes are generated from the priming and finishing production lines. These painting related hazardous wastes are generated from the cleaning of paint spray guns, tool cleaning, and waste body fill product. The hazardous waste satellite container is a 55-gallon drum with a self-closing lid/funnel

attached. At the time of the inspection, the lid was not able to close due to the presence of a container in the top of the device. This container was not appropriately labeled. This hazardous waste has been coded D001, F003, F005 and is currently managed by Hukill Chemical Corporation in Bedford, OH (OHD001926740). In the past, Stahl was a large quantity generator of hazardous waste due to this waste stream, but with current operations less than 25 gallons per month of this waste stream is generated at this time.

Previously, an alkaline wash with iron phosphate bath was used for cleaning parts. When spent, this wash was neutralized and sent to the Cardington sanitary system. Due to problems experienced by the Cardington waste water treatment plant, not necessarily due to activities by Stahl, the current process of power washing and collecting the wash waters for off-site disposal was implemented. No more details to this process and waste management were able to be provided at the time of the inspection.

Only small amounts of used oil are generated periodically. There was no used oil in accumulation at the time of the inspection.

Scrap metal is recycled when possible.

Forklifts are serviced by Bohl.

No fluorescent light bulbs were in accumulation at the time of the inspection and no records of management were made available.

DHWM, CO has no record of receipt for a calendar year 2008 hazardous waste generator annual report.

At this time, the hazardous waste generator status of this facility cannot be determined.