



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lea Fisher, Lt. Governor  
Chris Korleski, Director

November 17, 2010

Mr. Bill Sechrist  
Operations Manager  
Solutions Plus, Inc.  
3907 Bach Buxton Road  
Amelia, Ohio 45102

**Re: Complaint investigation, Solutions Plus, Inc., Clermont County**

Mr. Sechrist:

On November 3, 2010 Ohio EPA investigated a complaint at Solutions Plus, Inc. located at 3907 Bach Buxton Road in Amelia, Ohio. The complaint alleged dumping of waste chemicals on the ground and into the storm sewer and creek. A comprehensive inspection to determine compliance with **all** of Ohio's hazardous waste laws and regulations, as found under the Ohio Revised Code (ORC) and the Ohio Administrative Code (OAC) was not conducted. You represented Solutions Plus, Inc. and I represented Ohio EPA. Representatives from the Union township fire department were also present.

As a result of the complaint investigation, I noted the following violation and general concern relative to Ohio EPA's hazardous waste rules or laws. This letter describes the violations and general concern found during the inspection and the actions which Solutions Plus, Inc. should take to correct these.

Solutions Plus, Inc. should follow Ohio EPA's recommendations to abate each violation and address each general concern **within 30 days** of receipt of this letter. And, **within 30 days** of receipt of this letter Solutions Plus, Inc. should submit a written response describing how each violation and general concern has been abated.

**VIOLATION 1-**

**Waste Determination  
OAC 3745-52-11**

This regulation requires that a generator of waste determine if the waste meets the definition of a hazardous waste.

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During the inspection I noted several containers within the fenced lot area at the Solutions Plus, Inc. facility which appeared to be waste. You explained that Solutions Plus, Inc. had accumulated several containers of outdated, returned, or process generated waste which Solutions Plus, Inc. intended to dispose of. The following is a list of containers found which were accumulating waste.

- 1) 4 -55 gallon blue plastic drums
- 2) 5 -5 gallon white buckets
- 3) 10-white totes
- 4) 5-6 yellow over packs
- 5) Additional small containers

At the time of inspection November 3, 2010 Solutions Plus, Inc had not determined if the above waste was hazardous waste and is therefore in violation of OAC 3745-52-11.

To abate this violation ***within 30 days*** of receipt of this letter, determine if the contents of each of the listed containers is a hazardous waste and submit a written response explaining Solutions Plus Inc's conclusions. Provide any analytical data, waste profile information, or rationale describing how Solutions Plus Inc has determined if the contents of each container is hazardous waste or not. Attached are two links to assist Solutions Plus Inc in making determinations if their waste is hazardous or not.

<http://www.epa.ohio.gov/portals/41/sb/publications/identifyingwaste.pdf>

<http://www.epa.ohio.gov/portals/32/pdf/GeneratorKnowledge6.pdf>

<http://www.epa.ohio.gov/Default.aspx?tabid=3921>

#### **GENERAL CONCERN 1-**

Based on our discussions Solutions Plus Inc generates a wastewater discharge which you stated is treated and directed to the sanitary sewer, although you stated Solutions Plus Inc did not have a wastewater discharge permit from Clermont county sewer district or Ohio EPA. If a facility discharges a wastewater to the sanitary sewer or directly to surface water, or via storm sewer, a wastewater discharge permit is required.

Wastewater discharges are not regulated by Ohio EPA's Division of Hazardous Waste Management which I represent, but are regulated by either Clermont county sewer district or Ohio EPA's Division of Surface Water. I contacted Kevin Saunders (513)-965-4800 at Clermont county sewer and notified him of Solutions Plus Inc's wastewater discharge; therefore he will be contacting you. If he does not contact you, you should contact both the county sewer district and Ohio EPA's Division of Surface Water to determine if Solutions Plus Inc is required to have a wastewater discharge permit.

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**Within 30 days** of your receipt of this letter, provide a written explanation to me stating how this general concern has been addressed.

This concludes Ohio EPA's complaint investigation. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve you from having to comply with all applicable regulations. If you have any questions relative to this letter or about how to comply with other hazardous waste regulations please contact me at (937) 285-6357.

Sincerely,



Brian Gitzinger  
District Representative  
Division of Hazardous Waste Management

cc: DHWM Data Entry/ Facility file

ec: Gary Auffart, Assistant Chief, Union Township Fire Department  
gauffart@union-township.oh.us

BG\bp