

Wren Industries  
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File



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Dayton, Ohio 45402

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

August 24, 2007

Ms. Karin Francis  
Wren Industries Inc.  
P.O. Box 24009  
Dayton, Ohio 45424

**Re: Wren Industries, Complaint Investigation, 265 Lightner Road, Tipp City, Ohio, Miami County, Ohio EPA ID Number: OHD 986981009**

Dear Ms. Francis:

On August 23, 2007, I met with you at the Wren Industries facility on Lightner Road in Tipp City, Ohio, to investigate a complaint Ohio EPA received regarding used oil practices. I represented Ohio EPA in this matter. The complaint stated used oil fills the rods anchoring the stamping presses and seeps into the floor.

After walking around through the building and around the exterior, I did find that oil existed on the floors around the presses. However, there was also oil absorbent material in those areas to keep the oil in the vicinity of the presses.

We discussed the maintenance of the machines, and you indicated the collection pans under the presses were emptied as the oil collected above a certain amount. You also stated oil absorbent material was placed in a dumpster. As we discussed, provided the oil absorbent material did not drip oil, in other words, was not over saturated, then it could be placed in the dumpster. If the material was saturated, it should be drummed separately, labeled, and handled as used oil. I have enclosed some information on used oil handling for your information.

I did find the following violations.

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### Violations

**OAC 3745-279-22(C)(1), Used Oil Label.** Containers used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".

The tote and the red recycle bin in the basement pressroom were not labeled, in violation of OAC 3745-279-22(C)(1).

- ▶ Wren Industries must label the used oil containers with the words "Used Oil". While I was still on-site, you labeled the tote and the red bin with the "Used Oil" labels. As such, you are now in compliance with OAC 3745-279-22(C)(1).

During the investigation, I left a form with you for your completion. Please complete the form and submit it to my attention.

I have also enclosed information regarding hazardous waste management. Any person who generates waste must make a determination if the waste is hazardous waste, and if so, handle the waste according to hazardous waste regulations. If you have any questions about hazardous waste generation, used oil handling, this letter, or the complaint investigation, please contact me at (937) 285-6080.

Sincerely,



Debora Roth  
Ohio EPA  
Division of Hazardous Waste Management

Enclosures: Used Oil Fact Sheet, Hazardous Waste Generator Handbook

cc: Dinah Crawford/File

**NOTICE:**

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

DR\bp