



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

August 14, 2007

RE: CUSTOM CRANKSHAFT  
COLUBIANA COUNTY  
NOTICE OF VIOLATION (NOV)  
COMPLAINT NUMBER 6989

Scott Watson  
President  
Custom Crankshaft, Inc.  
1730 Annesley Road  
East Liverpool, OH 43920

Dear Mr. Watson:

On July 23, 2007, I as a representative of the Ohio EPA Division of Hazardous Waste Management, conducted an inspection of Custom Crankshaft, located at 1730 Annesley Road, East Liverpool, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. You and Ferguson Kind (Plant Manager) represented Custom Crankshaft during the inspection. You also provided additional information subsequent to my site visit.

This inspection was in response to a complaint received by Ohio EPA alleging that used oils and waste at the facility were not being properly managed.

The facility's main activity is the production of crankshafts from steel forgings. Reportedly only carbon steel forging are used; no leaded steel or stainless steels. No cleaning of the forgings is required prior to machining. No painting of products is conducted.

Production steps include cutting and grinding metal from the forgings to produce crankshafts. Cutting machines operate dry without cutting oil or lubricants. Steel chips and turnings are collected in a rolloff and recycled.

Grinding machines operate with a coolant that is a mixture of water and trimethanolamine (Altracool 751). Grinding machine sludge which is composed of steel particles and entrained coolant is shipped to Everclear as "Used Oil/Water/Coolant".

During my walk-through of the facility I observed a 55 gallon drum of material behind the building (i.e., on the east side of the building) that was being held for shipment to Everclear. It was unclear whether the material was spent coolant or grinding sludge with entrained coolant or used oil.

I also observed the following items behind the building (i.e., on the east side of the building). The soil to the south of the concrete pad had a heavy oil stain. An area in which open burning had been conducted, as evidenced by ashes, charred wood and some pieces of burnt metal, such as springs that appeared to be metal remains of old mattresses in the ashes, was observed near the concrete pad. Two old tires were in a dumpster used to stage materials prior to final disposal.

We also discussed the requirements for proper management of used fluorescent bulbs.

Based on the facility documents reviewed and observations made during the facility walk-through, Ohio EPA has determined that Custom Crankshaft has violated the following state used oil regulation:

1. OAC 3745-279-22(D) Generator must respond to used oil releases and perform cleanup steps.

Ohio Administrative Code (OAC) Rule OAC 3745-279 22(D) requires a generator of used oil to respond to used oil releases and perform cleanup steps. The soil to the south of the concrete pad had a heavy oil stain that appeared to be from used oil

By this letter, you are requested to:

- 1) Determine whether there are any other locations in addition to that noted above present at the facility on which used oil has been released.
- 2) Clean up and remove all released used oil and contaminated soils and debris identified by me as well as any additional releases identified by you.

Ohio EPA uses a visual standard when determining whether a cleanup of released used oil and any media that absorbed used oil is adequate. Ohio EPA does not require confirmatory soil sampling and analysis to demonstrate that the release has been cleaned up.

- 3) Manage used oil and contaminated soils and debris from the clean up in one of the two following ways:
  - If the clean up residue is to be burned for energy recovery, it can be managed as used oil under the used oil regulations: or,
  - If the clean up residue is not going to be burned for energy recovery, it may be managed as a solid waste by placing into dumpster for transport to a landfill.
- 4) Submit pictures of the areas from which used oil has been removed to me within 30 days of receipt of this letter.

**Other Issues.**

**Open Burning**

An area in which open burning had been conducted, as evidenced by ashes, charred wood and some pieces of burnt metal, such as springs that appeared to be metal remains of old mattresses in the ashes.

By this letter, you are requested to:

- 1) Remove and dispose of ashes and debris from the open burning conducted at the facility.
- 2) Submit pictures of the areas from which ashes have been removed to me within 30 days of receipt of this letter.

Any and all future open burning must be in compliance with Ohio EPA Division of Air Pollution Control (DAPC) rules. The DAPC contact for open burning in Columbiana County is Darren Machuga of this office. His phone number is (330) 963-1287.

CUSTOM CRANKSHAFT  
AUGUST 14, 2007  
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**Requested documentation and checklists**

Please submit all the above requested documentation to this office within 30 days of receipt of this letter demonstrating that all violations have been abated and that the designated actions have been taken.

Enclosed you will find a copy of the checklist completed for the inspection.

**Other Information**

A copy of Ohio EPA's guidance on management of spent fluorescent bulbs is attached. Several additional environmental compliance guides relevant to your business can be accessed at the following internet site: <http://www.epa.state.oh.us/ocapp/sb/autoindex.html>.

You can find copies of Ohio's hazardous waste laws and regulations at our web page at: <http://www.epa.state.oh.us/dhwm/Law&Regs.html>.

Ohio EPA DHWM factsheets can be found at the following internet site:  
<http://www.epa.state.oh.us/dhwm/factsheets.html>.

The OEPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes and pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image through pollution prevention.

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Hazardous Waste Management

NJW:ddw

Enclosures

ec: Natalie Oryshkewych, DHWM, NEDO  
Darren Machuga, DAPC, NEDO  
Ed D'Amato, DHWM, NEDO  
Harry Sarvis, DHWM, CO

**NOTICE:**

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

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

For Ohio EPA use only

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

2. Site EPA ID No.

3. Site Name:

EPA ID Number: non-notifier		Website: http://customcrankshaft.net/index.html (Optional)	
Name: Custom Crankshaft			
Street Address: 1730 Annesley Rd.			
City, Town, or Village: East Liverpool		State: OH	
County Name: Columbiana		Zip Code: 43920	
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"/>
First Name: Scott		MI:	Last Name: Watson
Phone Number: 330-382-1200		Phone Number Extension:	
E-Mail Address: customcrankshaft@comcast.net			
Fax Number:		Fax Number Extension:	
Street or P.O. Box:			
City, Town or Village:			
State:		Country:	Zip Code:
Name of Site's Legal Owner: Rebecca Dysert		Date Became Owner (mm/dd/yyyy):	
Owner Type:	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"/>			
Street or P.O. Box:			
City, Town or Village:		Owner Phone #:	
State:		Country:	Zip Code:
Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):	
Owner Type:	Private <input 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"/>			
Street or P.O. Box:			
City, Town or Village:		Operator Phone #:	
State:		Country:	Zip Code:
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

Mark  in all of the appropriate boxes.

<input type="checkbox"/> Not Regulated	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste
<input type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
<input type="checkbox"/> Small Quantity Generator (SQG)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Underground Injection Control Facility	

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

Small Quantity Handler of Universal Waste  
 Destination Facility for Universal Waste

Large Quantity Handler of Universal Waste  
 (accumulates 1000 lbs or more)

Check all boxes below that apply for each of the three types of facilities above

10C. Used Oil Activities (Indicate Type(s) of Activity(ies))

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

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federal universal waste materials in the order in which they are presented in the regulations. Do not use codes in addition here 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.

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
Tanks	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Containers	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Additional Facility Representatives:  
 Other Comments:

Name of Inspector(s): **Neil Wasilk** Date of Inspection Time: **7/23/2007 2:50 p.m.**

I certify under penalty of law that this document and all data herein are true and accurate. I understand that anyone who furnishes false or misleading information on this form or who omits material or information requested on the form may be subject to criminal sanctions (including fines and imprisonment) and/or civil sanctions (including civil penalties).		
Signature	Name and Title (Print)	Date

Custom Crankshaft, Inc.  
1730 Annesley Road  
East Liverpool, OH 43920

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**PROCESS DESCRIPTION SECTION**

Give a general process description (include all processes at the facility)

The facility's main activity is the production of crankshafts from steel forgings. It has been located at this site since 2004. There are about 20 employees.

The facility purchases steel forgings up to 16 inches in diameter for use in producing crankshafts. Reportedly only carbon steel forging are used; no leaded steel or stainless steels. No cleaning of the forging is required prior to machining. No painting of products is conducted.

Production steps include cutting and grinding metal from the forgings to produce crankshafts. Cutting machines operate dry without cutting oil or lubricants. Steel chips and turnings are collected in a rolloff and recycled.

Grinding machines operate with a coolant that is a mixture of water and trimethanolamine (Altracool 751). Grinding machine sludge which is composed of steel particles and entrained coolant is shipped to Everclear as "Used Oil/Water/Coolant".

Altra Waylube 68 is used as a lubricant for gear boxes and bearing on the metal cutting and grinding machines. Any used oil from these sources is reportedly managed as used oil.

Altracut 157SC, which is a petroleum-based lubricant, is used as a rust preventative on finished product. No wastes expected from use of this material.

Walk-Through Observations.

One 55-gallon drum was located on the concrete pad behind the building. Reportedly it was being held for a quarterly pickup by Everclear. Contents were thought to be used coolant.

Steel shavings were observed in a rolloff box and were being held for pickup by metal recycler.

Ashes and remains from open burning were observed just off the pad behind the building. Metal pieces that appeared to possibly be the remains of a mattress were present in the ashes. Reportedly, the facility talked with the local Fire Chief before burning. Facility was advised that open burning can only be conducted if it meets OEPA rules and that ashes would have to be removed.

Several tires were observed in a "staging" rolloff on the pad behind the building. Facility was advised that tires can not be placed in solid waste dumpsters.

An oil stain, apparently from used oil, was observed on the soil just off the south edge of the concrete pad behind the building. Facility was advised that this would have to be removed and disposed in solid waste dumpster.

Inside building a floor trench for collecting oil was observed. Some oil was observed in the trench. Facility thought that this is a blind trench; suggested that facility confirm. Facility was also advised to remove oil frequently.

No hazardous wastes were identified during the facility visit.

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**WASTE ACTIVITIES AND P2 SUMMARY SECTION**

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities

**REMARKS-GENERAL INFORMATION**

**Regulatory/Enforcement History (if applicable):**

**Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment?

\*If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**

*Custom CRANKSHAFT*  
**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# \_\_\_

**USED OIL GENERATOR STANDARDS**

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(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# \_\_\_
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# \_\_\_  
*CONTAINERS*
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#   
*NOT OBSERVED*
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#   
*NOT OBSERVED*
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? *ARMA WARM PAD BEHIND BUILDING; HEAVY OIL STAINING* 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 than 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# \_\_\_

C:\My Documents\OEPA Forms\USED OIL.SHORT.11.2004.wpd

**REMARKS**