OhioEPA
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

June 8, 2007

RE: ELSTER PERFECTION
LAKE COUNTY
NOTICE OF VIOLATION (NOV)/RTC
COMPLAINT NUMBER 6968

Benjamin J. Slane
Lean Transformation Manager
Elster Perfection
222 Lake Street
Madison, OH 44057

Dear Mr. Slane:

On May 21, 2007, I, as a representative of the Ohio EPA's Division of Hazardous Waste Management, conducted an inspection of Elster Perfection, located at 222 Lake Street, Madison, Ohio, for compliance with Ohio's hazardous waste and used oil regulations. Robert Diak (Manager, Manufacturing Engineering) represented Elster Perfection during the inspection. You provided additional information subsequent to my site visit.

This inspection was in response to a complaint received by Ohio EPA alleging that chemicals used to thread and clean pipe at the facility had leaked into the ground and that the tanks in which pipe nipples are dipped into for cleaning have until recently leaked into the ground.

The facility's main activity is the production of metal products to transport natural gas from the distribution main to the customer's meter. All products produced at this facility are steel; no plastic piping produced. No painting is conducted at the facility. All painting is done at an offsite contractor.

Production steps include: cutting, threading, bending, welding and deoiling pipe.

Threaded pipe nipples are deoiled using a hot aqueous detergent cleaning solution. Deoiling process results in skimmed oil and wash water which is an oil/water mixture that is sent offsite for recycling.

During my walk-through of the facility I observed that the tank in which pipe nipples are dipped into for cleaning is located on a concrete floor within the main production building. I observed a small puddle of oily material on the concrete behind the tank. It appeared more likely to be the result of a small spill rather than a tank. You explained that sometimes placement of the box containing the nipples into the tank results in a wave that overtops the tank. Mr. Diak reported that the tank is emptied periodically and inspected for possible leaks at that time. Reportedly no leaks have observed.

I did not observe evidence of the leakage alleged in the complaint.

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

1. OAC 3745-279 22(C)(1) Used oil containers and tanks must be labeled with the words Used Oil

During my walk-through of the facility outdoor portion of the property I observed that the pan used to hold oil removed from the scrap metal hoppers was not labeled or marked with words "Used Oil". The area adjacent to the pan used to hold oil removed from the scrap metal hoppers could benefit from better housekeeping practices, as there was evidence of staining on the concrete.

Reportedly the tank that stores used oil skimmed from the threaded nipple washing tank and gaylords used to hold saturated oil sorbents are also not labeled or marked with words "Used Oil".

All used oil containers and tanks must be labeled with the words "Used Oil".

The facility abated the violation subsequent to the inspection by labeling the pan used to hold oil at the scrap metal hoppers and the tank that stores used oil skimmed from the threaded nipple washing tank containers with the words: "Used Oil". You emailed photos of these labels to me on June 5, 2007.

Additional information on used oil generator requirements is available on the internet at: http://www.epa.state.oh.us/dhwm/pdf/Used_Oil_Generators_Guidance.pdf

Other Information

Several 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
Ed D'Amato, DHWM, NEDO

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.

Elster Perfection
222 Lake Street
Madison, OH 44057

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PROCESS DESCRIPTION SECTION

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

Facility's main manufacturing activities are production of products to get natural gas from the main to meter. All steel products produced at this facility; no plastic piping produced. No painting is conducted at the facility. All painting is done offsite.

Pipe is cut to length and threaded. Cut, thread, bend and weld. Large reservoir to collect cutting oil for reuse is located underneath the threading machines. Oil sobents are used adjacent to the reservoir to collect any oil that is splashed from the threading machines beyond the reservoir. When saturated these are disposed as solid waste.

Threaded pipe is deoiled using a hot aqueous detergent cleaning solution. Deoiling process results in oil that is skimmed from the tank while tank is in operation and spent wash water which removed several times per year. Both are stored in an on-site tank prior to off-site shipment for management as an oil/water mixture that is processed for oil recycling.

Reportedly no chlorinated solvents used at the facility.

Facility previously conducted phosphate coating. This process ceased operation in Feb. 2007. Some containers of pickling acid and phosphoric acid used in phosphate coating process were still onsite. Facility states that these will be re-used by the contractor that now does the phosphate coating.

Scrap metal is held in a hopper outdoors. During storage oil drips from scraps and is collected.

Facility uses several parts cleaners. Crystal Clean provides and recycles 140 plus flash point parts cleaners solvent.

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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.

Used oil is generated from cutting oils and several other sources. It is recycled through Everclear. Reportedly the facility does not do oil changes or vehicle maintenance.

Oil absorbent pads and oil dry are used to clean-up oil that splashes or spills from the machines and other plant operations. These sorbents are managed as used oil and sent GEM.

Used fluorescent bulbs are GE EcoLux that per information provided by GE can be disposed as non-hazardous waste.

No hazardous wastes were identified during the facility visit.

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 or www.epa.state.oh.us/ocapp/ocapp.html

Other:

EASTER PERFECTION

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#___

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#___

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#___

C:\My Documents\OEPA Forms\USEDOIL.SHORT.11.2004.wpd

REMARKS