



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

March 1, 2010

**RE: TRUCAST, INC.
OHD 986 998 466
CESGG/NOV**

Bradley Nicholson
Trucast, Inc.
4382 Hamann Pkwy.
Willoughby, OH 44094

Dear Mr. Nicholson:

On February 23, 2010, I met with you to conduct an inspection of Trucast, Inc. located at 4382 Hamann Pkwy., Willoughby, OH. One purpose of this was to determine if Trucast was in compliance with Ohio's hazardous waste and used oil laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Please see the attached Process and Waste Summary chart for my understanding of this facility's operations.

This letter will document any violations and concerns found and outline what you need to do to correct them.

The following violations were found:

1. OAC rule 3745-52-11 – Hazardous waste determination.
This rule requires that any person who generates a waste must determine if that waste is a hazardous waste. The following documents were given to you during the inspection:

Identifying Your Hazardous Waste, 2006

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

OAC 3745-51-21 to 24 characteristic hazardous waste

http://www.epa.ohio.gov/dhwm/laws_regs.aspx

Trucast violated this rule by disposing of waste lamps (including fluorescent lamps) with regular trash without determining whether or not they are a hazardous waste. Fluorescent and some other types of lamps contain mercury and may contain other hazardous metals. When burned out they may be a hazardous waste. If you choose to gather data to make this determination, it will need to be done for each type of fluorescent lamp you use. I believe you use T12 lamps made by Sylvania in the back of the shop and T8 or T5 Alto lamps (green end caps) made by Philips in the front of the shop. As an alternative to determining whether your particular waste lamps are hazardous waste, you may

Bradley Nicholson
Trucast, Inc.
March 1, 2010
Page 2

wish to manage them as universal waste. In general, this would involve saving the waste lamps in a properly labeled and closed container (such as a cardboard box) and having them picked up by a lamp recycler.

The following document was given to you during the inspection:

Ohio's Universal Waste Rules: Are You Handling Used Lamps Correctly?, 2008
<http://www.epa.ohio.gov/portals/41/sb/publications/Lampcompliancechecklist.pdf>.

Also, local lamp recycling companies are listed in the following document which was given to you during the inspection:

Waste Disposal and Recycling Companies in Northeast Ohio, 2009
Please send me a description of how you will now properly manage waste lamps.

2. OAC rule 3745-279-22(C) - Used oil labels.
This rule requires containers and aboveground tanks for used oil to be labeled or marked clearly with the words "Used Oil". The following document was given to you during the inspection:

Overview for Ohio Businesses Who Generate Used Oil, 2006
<http://www.epa.ohio.gov/LinkClick.aspx?fileticket=XEg%2fu%2bpZGaM%3d&tabid=3923>.

Trucast violated this rule by having 2 totes of used coolant (which is classified as a used oil) that were not labeled as used oil. You must now properly label all containers of used oil and provide documentation of that to me.

A written response to these issues is required within 30 days.

I commend you on your efforts to increase your energy efficiency which have included a lighting retrofit and recovery of waste heat from your air compressor.

Another purpose of the inspection was to look for ways you may be able to reduce your waste generation, conserve energy, and save money. For example, it may be possible to extend your change out period for the solvent in your parts washer without important changes to the parts cleaning needed. There also may be a solvent that you can use in your parts washer that would not be a hazardous waste when spent. A power point training regarding parts cleaning developed by Ohio EPA's Office of Compliance Assistance and Pollution Prevention can be found at:

<http://epa.ohio.gov/LinkClick.aspx?fileticket=KJvFKa2YiE1%3d&tabid=2659>.

Bradley Nicholson
Trucast, Inc.
March 1, 2010
Page 3

That office may be able to offer more help on this issue. They can be contacted at (800) 329-7518 ,or <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

You may want to add a filter to your parts washer which would extent the useful life of the solvent. Do-it-yourself instructions for adding filtration using a common oil filter are enclosed and can be found at: <http://www.iwrc.org/downloads/pdf/partsWasher1x1.pdf>.

The solvent alternative guide found at: <http://www.p2pays.org/ref/19/18161/index.cfm.htm> may be useful, as well as, this site <https://js3.ctc.com/>.

The following document, which is enclosed, might be useful in regards to your used coolant:

Extending the Life of Metal Working Fluids, 1993
<http://www.epa.ohio.gov/ocapp/p2/fact11.aspx>

The following additional documents were given to you during the inspection:

E4S Sustainable Business to Business Directory
http://www.e4s.org/content/resource_energy_efficiency.asp
Midwest Combined Heat and Power Application Center
<http://www.chpcentermw.org/home.html>
Pollution Prevention Opportunities, 2003
<http://epa.ohio.gov/portals/32/pdf/P2OppsGeneral.pdf>
Sustainable/Green Business Toolkit
<http://epa.ohio.gov/LinkClick.aspx?fileticket=6PhtW3qaSyk%3d&tabid=2668>

Other information and suggestions:

- Entrepreneurs for Sustainability is a group that seeks to “build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health.” They offer workshops, conferences, a business to business directory and more. Their website is at <http://www.e4s.org/content/index.asp>.
- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>.

Bradley Nicholson
Trucast, Inc.
March 1, 2010
Page 4

- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is (800) 225-5051 and website is <http://www.ohioairquality.org/>.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://epa.ohio.gov/dhwm>.

If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,


Robert Almquist
Division of Hazardous Waste Management

RA:cl
Enclosures

cc: Marlene Kinney, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Natalie Oryshkewych, 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.

Send to Central Office

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

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No. EPA ID Number: **OHD 987 019 452**

Site Name Name: **Geartec** Website: **http://www.geartec.com/**
(Optional)

Site Location Information Street Address: **4245 Hamann Pkwy**
City, Town, or Village: **Willoughby** State: **OH**

County Name: **Lake** Zip Code: **44094**

Site Land Type (check only one) Private County District Federal Indian Municipal State Other

NAICS code(s) www.census.gov/epcd/www/whnaics.html

Facility Representative First Name: **Matt** MI: Last Name: **Tucci**

Phone Number: **440-953-3900** Phone Number Extension: **114**

E-Mail Address: **mtucci@geartec.com**

Fax Number: **440-953-3906** Fax Number Extension:

Street or P.O. Box:

City, Town or Village:

State: Zip Code:

Legal Owner And Operator of the Site. Name of Site's Legal Owner: **United Stars** Date Became Owner (mm/dd/yyyy): **7-18-2008**

List Additional Owners and/or Operators in the Comment Section or on another copy of this form page. Owner Type: Private County District Federal Indian Municipal State Other

Street or P.O. Box: **1546 Henry Ave.**

City, Town or Village: **Beloit** Owner Phone #:

State: **WI** Country: Zip Code: **53511**

Name of Site's Operator: Date Became Operator (mm/dd/yyyy):

Operator Type: Private County District Federal Indian Municipal State Other

Street or P.O. Box:

City, Town or Village: Operator Phone #:

State: Country: Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

Not a HW Generator UNKNOWN: Cited for violation of 3745-52-11

- Large Quantity Generator (LQG)
- Small Quantity Generator (SQG)
- Conditionally Exempt Small Quantity Generator
- U.S. Importer of Hazardous Waste
- Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

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

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 5,000 kg. or more)

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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

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

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 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 wastes handled at this site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent RCRAInfo record.

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

Announced Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Robert Almquist

Name of Inspector(s)

Date of Inspection Time
(mm/dd/yyyy) (hh:mm)
02-23-2010

Comments:

Process and Waste Summary for: Geartec, OHD 987 019 452, 2-23-10 inspection				
#	Process generating the waste	Waste details	On-site management	Off-site management
1	Machining such as turning	used water-soluble coolant	3,000 gallon tank in the back corner of the shop	Picked up by Everclear, Austintown, OH (OHR000015792). Last picked up 1600 gallons listed as used oil/water/coolant on 10-15-09.
2	Machining such as hobbing	used cutting oil	Same as 1	Same as 1
3	Collecting leaks from machines	hydraulic oil wrung out of adsorbent pads	Drains into drum and then is pumped into tank same as 1	Same as 1
4		floor scrubbing water	Same as 1	Same as 1
5	Filtering swarf from machining coolant	Filter paper and swarf (no bronze run on these machines)		Disposed of with regular trash (solid waste)
6		Cardboard		Some was seen in the solid waste dumpster
7	Lighting	Waste fluorescent lamps, appeared to be T12 alto lamps (green end caps)	Change all lamps at once every 3 ½ years or so. No waste lamps onsite at time of inspection.	Picked up by American Recycling, Cleveland, OH. Picked up 65 four foot lamps and 180 eight foot lamps on 4-5-00
8		Empty aerosol cans		Disposed of with regular trash
9	Parts washing	Waste Crystal Clean Premium 142 Mineral Spirits (petroleum distillates) from 3 parts washers		About 32 gallons picked up every 6 weeks directly from parts washer by Heritage-Crystal Clean, Broadview Heights, OH as nonRCRA used solvent.

10	Machining	Steel	Stored inside in hopper	Picked up by DeMilta
11	Machining	bronze	Stored inside in drums	Picked up by DeMilta
12		Coolant and oil collected below steel chip hopper	Collected in bin under steel chip hopper	Pumped out and taken by DeMilta

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATERS		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transportes used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		