



State of Ohio Environmental Protection Agency

**Northwest District Office**

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Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Stony Brook Cabinet Company  
f.k.a. Jeffery Allen Industries  
Crawford County  
Hazardous Waste  
Inspection / Complaint #2598  
Notice of Violation

January 24, 2008

Mr. Ron Manco, Owner  
Stony Brook Cabinet Company  
340 Dawsett Avenue  
Galion, Ohio 44833

Dear Mr. Manco:

On November 27, 2007, Kara Reynolds and I visited Stony Brook Cabinet Company (SBCC) f.k.a. Jeffery Allen Industries. This visit was a follow-up to Ohio EPA's previous complaint investigation (2543 and 2598) conducted at the previous business on May 10, 2006 and January 31, 2007. The reason for this follow-up visit was to ascertain current regulatory status of the previous business.

SBCC manufactures standard and custom cabinetry. SBCC utilizes lacquer and varnish finishes. SBCC operates two (2) paint booths where finishes to the cabinets are applied. SBCC generates spent solvent/paint related hazardous waste (D001). At the time of this visit, it appeared that SBCC was operating as a conditionally exempt small quantity generator of hazardous waste. SBCC continues to use the same stains and solvents previously used by Jeffery Allen Industries.

During our investigation on January 31, 2007, we observed a 55-gallon drum being used to collect the spent paint related hazardous waste (D001). At the time of the January 31, 2007, inspection, the drum was less than 1/3 full. You stated that since our visit in May 2006, you have not generated enough spent solvent to require its disposal. You added that solvent rags are being managed also as hazardous waste (D001). Spent paint filters used in the paint booth are currently being disposed of in your trash and no documentation has been submitted to document a waste evaluation.

The following violations were noted during this visit. You must submit to me the requested documentation **within 30 days of the receipt of this letter.**

1. **Ohio Administrative Code (OAC) Rule 3745-52-11: Waste Evaluation**

Any person who generates a waste as defined in Rule 3745-51-02 of the administrative code must determine if that waste is a hazardous waste:

- a. At the time of this visit, SBCC had not properly evaluated the paint booth filters to determine if the filters are considered a hazardous waste. You must immediately stop the disposal of spent paint booth filters into your trash.

**To abate this violation**, SBCC must take representative samples of the spent paint filters. The samples shall be analyzed for Resource Conservation and Recovery Act (RCRA) metals, and volatile organic compounds. Toxicity Characteristic Leaching Procedure (TCLP) must be obtained to ensure these constituents are not present above Ohio EPA regulatory levels.

Ohio EPA will use the analytical data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data. To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained from Ohio EPA's web page: [http://www.epa.state.oh.us/dhwm/tier\\_i\\_data\\_validation\\_manual.html](http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html).

Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

- b. SBCC has failed to have waste evaluation documentation for the fluorescent bulbs generated at the facility.

**To abate this violation**, SBCC must conduct a proper waste evaluation of the spent light bulbs. The waste evaluation must be conducted through one of three options: 1) SBCC may apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation [manufacturer analytical information – toxicity characteristic leaching procedure (TCLP) test results], or 2) SBCC may take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. SBCC must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. SBCC must sample the fluorescent bulbs to determine the concentration of mercury (D009), lead (D008) and cadmium (D006) as listed in OAC Rule 3745-51-24 following the method outlined in U.S. EPA's SW-846. SBCC may run a total concentration for this constituent as a screening tool. If the concentration is detected for mercury at or above the regulatory limit, a TCLP may be required to ensure this constituent is not present above the Ohio EPA regulatory level, or 3) a combination of options 1 and 2.

If the bulbs are determined to be hazardous through a proper waste evaluation, SBCC will have to manage their bulbs either as 1) a universal waste (OAC Chapter 3745-273), or 2) as a hazardous waste under Ohio's generator standards (OAC Chapter 3745-52). ***SBCC may recycle their bulbs if they are hazardous or non-hazardous. Ohio EPA would encourage this option as a pollution prevention alternative.***

In lieu of conducting a waste evaluation, SBCC may choose to manage their bulbs as a universal waste as outlined in OAC Chapter 3745-273. Please consult the fact sheet Universal Waste Rules for Handlers of Lamps given to you during the investigation for more information. If you choose this option, please provide me an outline of your universal waste management plan.

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Please note that if, after the proper evaluation of your generated waste, a hazardous waste is identified, additional violations may be cited.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at [www.epa.state.oh.us/dhwm/listserv.html](http://www.epa.state.oh.us/dhwm/listserv.html). Please feel free to share this information with your colleagues.

You may be able to reduce the waste your company generates. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates, you may be able to reduce your treatment and disposal costs. This may include the substitution of your raw products in order to reduce or eliminate the generation of hazardous waste. Thus, you may possibly reduce your regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: [www.epa.state.oh.us/pic/ocapp/ocapp.html](http://www.epa.state.oh.us/pic/ocapp/ocapp.html).

Please contact me if you have any questions pertaining to this information. You can find copies of the rules and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm).

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3015.

Sincerely,



Edgar V. Pulido  
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO  
Colleen Weaver, DHWM, NWDO  
~~DHWM, NWDO File: Stony Brook Cabinet Company, Crawford County (New File)~~

ec: Ed Pulido, DHWM, NWDO

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.
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**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**WASTE EVALUATION**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes  No  N/A

**TREATMENT OF HAZARDOUS WASTE**

- a. Container that meets 3745-66-70 to 3745-66-77? Yes  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

**REMARKS**

#1 – Stony Brook Cabinet Co. failed to evaluate paint booth filters.

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Stony Brook Cabinet Company

**Facility Type:** LQG/SQG/CESQG/TSD

**EPA ID#:** OHD

Description of Waste				On-Site Management			Off-Site Management	P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities	
1	Wood finishing	Paint Booth Filters	NA	2	Container	NA	Indoor	None	NA
2	Cleaning paint equipment	Spent solvent (Not being collected at this time)	D001	<1 gallon	Container	NA	Indoor	A drum has not been shipped out yet	NA
3	Stain application/cleaning	Solvent contaminated rags	n/a	4	Drum	Na	Indoor	Disposed of as solid waste	--
4	Maintenance	Fluorescent light bulbs	NA	<1	Box	NA	Indoor	Being disposed as solid waste	-

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  
 McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHR								
3. Site Name	Name: Stony Brook Cabinet Company				Website: (Optional)				
4. Site Location Information	Street Address: 340 Dawsett Avenue								
	City, Town, or Village: Galion				State: OH				
	County Name: Crawford				Zip Code: 44833				
5. Site Land Type (check only one)	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"/>	
6. NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>									
7. Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Ron			MI:	Last Name: Manco				
	Phone Number:				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:								
	State:			Country:		Zip Code:			
	Name of Site's Legal Owner: Ohio Galvanizing Corp.							Date Became Owner (mm/dd/yyyy):	
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	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:				
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" 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))			
<input checked="" type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b> (accumulates 5,000 kg. or more)	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>			
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))	
	<b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
<b>Batteries</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
<b>Mercury containing equipment</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Processor</b>	
<b>Lamps</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>	
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page 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.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Edgar Pulido		Kara Reynolds	11/27/2007 2:00pm
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)	Date (mm/dd/yyyy)