



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Ridgeton Restoration
OHR000164111
Crawford County
Complaint #3058
Hazardous Waste
Partial Return to Compliance

August 18, 2011

Mr. Pat Blank, Owner
The Ridgeton Restoration Company, Ltd.
1411 North Sandusky Avenue
Bucyrus, Ohio 44820

Dear Mr. Blank:

On March 14, 2011, Ohio EPA conducted a complaint investigation (CI) and compliance evaluation inspection (CEI) of The Ridgeton Restoration Company, Ltd. (RRC) located at 1411 North Sandusky Avenue in Bucyrus, Ohio. You accompanied me throughout the investigation and inspection. I identified six violations of Ohio's hazardous waste laws and notified you of these violations in a Notice of Violation letter (NOV), dated March 23, 2011.

In a Partial Return to Compliance letter (PRTC) dated June 1, 2011, you were requested to provide additional information about your operation in Bucyrus, Ohio. Also, you were informed that although you had made progress in abating the violations cited in the March 23, 2011, NOV, none of the violations had been abated yet. On June 21, 2011, I returned to your facility to observe the sampling of your waste streams. On this day I observed two additional violations of Ohio's hazardous waste laws and notified you of these new violations and your status with regard to the original violations in a letter dated July 1, 2011. Ohio EPA received your response on July 6, 2011.

In its June 1, 2011, Partial Return to Compliance letter, Ohio EPA required RRC to do the following and submit the required information:

1. Submit copies of the Heritage waste profiles.

Attached to your July 6, 2011, response letter are copies of two Heritage-Crystal Clean profiles; one for the stripper sludge and one for the stripper rags. RRC should make sure Heritage-Crystal Clean understands that the

stripper sludge is the hazardous waste F002, F003 & D008. RRC has submitted the information required here.

2. Explain how you have evaluated your hazardous waste and what your conclusions are.

See Ohio EPA's response to violation number two below. In addition you have indicated that RRC is not interested in continuing to use methylene chloride and intends to use a different product. Also, you intend to use a rinse system "that will greatly reduce if not eliminate rinse water disposal." Please feel free to contact me to discuss the proper evaluation of any new waste that RRC generates. RRC has submitted the information required here.

3. Submit a photograph of the containers that you are using to accumulate your hazardous waste.

Attached to your July 6, 2011, response letter are photos of the used rags container and the used stripper and sludge container. I also obtained photos of these containers while I observed sampling at RRC on June 21, 2011. RRC has submitted the information required here.

4. Submit photographs documenting the work you have done to clean up the shop.

Attached to your July 6, 2011, response letter are three photos depicting the work you have done to clean up the shop. I also obtained photos of the condition of the shop while I observed sampling at RRC on June 21, 2011. RRC has submitted the information required here.

5. Describe the dimensions of the pit and explain what you have done about it. The waste in the pit must be pumped out immediately and placed into an accumulation drum for proper disposal as a hazardous waste (F002 and F003).

In your July 6, 2011, response letter, you state that the pit "was the diameter of a 55 gallon drum, and roughly two feet deep." You also state that the waste in the pit was removed and placed into a drum. Finally you state that you have "closed the pit by filling the hole with concrete." Please be aware the RRC must determine the extent of contamination to the soil and ground water from its use of the pit and that the concrete must

be removed in order for RRC to perform this cleanup work. RRC has submitted the information required here.

6. Explain in detail how you refinish pieces at your Bucyrus facility, how you clean the spray paint/finish equipment and what waste (and amount) is generated from this cleaning operation.

In your July 6, 2011, response letter you explain that RRC typically uses lacquer thinner to clean the staining equipment. RRC keeps about a pint of the thinner in a can in the spray room for soaking the spray gun nozzle. Attached to the July 6, 2011, response letter is a copy of the MSDS cover page for the thinner. According to this document, the waste from this cleaning operation at RRC is hazardous waste F003 and F005. The waste generated from this cleaning process is a very small amount. RRC has submitted the information required here.

7. List the specific alcohol that is used to wipe down the stripped pieces.

Attached to your July 6, 2011, response letter is a copy of the MSDS for alcohol used in the process. According to the MSDS the material is a mixture including ethanol, methanol, ethyl acetate and heptane. RRC has submitted the information required here.

8. Submit a photograph of the outside area where you stripped pieces, in the past.

Attached to your July 6, 2011, response letter is a photo of the outside cement slab where pieces were rinsed. RRC has submitted the information required here.

9. List all addresses where the rags were burned and describe the method of burning.

In your July 6, 2011, response letter you state that the rags were taken to your home at 3607 Ridgeton Road in Bucyrus, Ohio, where they were open burned. RRC has submitted the information required here.

10. Explain in detail how you operated the wash water pit. Explain what you have done in the past with the waste that accumulated in the pit.

In your July 6, 2011, response letter you state that "rinsing often occurred outside." In the winter RRC did the rinsing inside and used the pit for the rinse water waste. Furthermore, you state that "any waste that remained after rinsing was disposed of along with the other waste as described earlier. We let it dry out." RRC has submitted the information required here.

Below is a record of the violations cited in Ohio EPA's March 23 and July 1, 2011, NOVs. In order to correct these violations, you must do the following and send me the required information, **within 30 days** of your receipt of this letter:

1. **Unpermitted Hazardous Waste Treatment, Storage & Disposal
ORC Section 3734.02(E)&(F) (two violations)**

and

**Causing the Transportation of Hazardous Waste to an Unauthorized Facility
ORC Section 3734.02(F) (one violation)**

In your July 6, 2011, response letter you explain that RRC is working on the process of closing the hazardous waste units. In an email message dated July 26, 2011, you state that Green Environmental has agreed to assist with the development of a closure plan for RRC and that you should be able to submit the plan soon. RRC must submit to Ohio EPA a plan to close all the hazardous waste management units.

RRC must make arrangements to have the hazardous waste it has accumulated in containers shipped to a permitted treatment, storage or disposal facility immediately. RRC must follow the rules for a small quantity generator when offering this hazardous waste for transportation off-site, including the use of a manifest and land disposal restriction notice, as well as properly labeling and marking of the containers.

2. **Waste Evaluation
OAC Rule 3745-52-11 (three violations)**

Ohio EPA has determined that RRC was operating as a hazardous waste small quantity generator.

On June 21, 2011, I returned to your facility to observe the sampling of your waste streams by a representative of Heritage Environmental Services. Attached to an email dated July 8, 2011, are the analytical summaries for the two samples collected on June 21, 2011. The analytical reports demonstrate that spent methylene chloride/methanol stripper/paint sludge waste and spent methylene chloride/methanol wash water and paint sludge is also hazardous for lead (D008), since the TCLP concentration of the waste is 68 mg/L and the regulatory limit is 5 mg/L. This waste was already identified as the listed hazardous waste F002 & F003.

The analytical results also demonstrate that the rags were not hazardous waste at the time of sampling, since the TCLP concentration of the waste is 0.96 mg/L and the regulatory limit is 5 mg/L. However, Ohio EPA strongly recommends that RRC sample and analyze its spent stripper rags at least annually, to confirm this result. Please be aware that these rags do not include any rags that may be used in the gross stripping operations. These rags would be hazardous waste F002, F003 and D008. As a result of sampling arranged by RRC, and since RRC has submitted the analytical results to Ohio EPA, this violation was abated on July 8, 2011.

**3. Universal Waste Packaging - Lamps
OAC Rule 3745-273-13(D)(1)**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

RRC did not place its lamps into a closed container. In order to correct this violation, RRC must place all spent lamps into containers or packages that are structurally sound and adequate to prevent breakage of the spent lamps; close each container; and submit photographic documentation that this has been done.

RRC must respond to this violation.

**4. Accumulation Time for Universal Waste - Lamps
OAC Rule 3745-273-15(C)**

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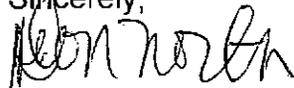
A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

RRC was not able to demonstrate the length of time the universal waste lamps were accumulated. In order to correct this violation, RRC must place a date on each container once a universal waste lamp is placed into it and submit photographic documentation that this has been done.

RRC must respond to this violation.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/cs

pc: Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
DMWM-HW, NWDO File, Crawford County, Ridgeton Restoration File
ec: Don North, DMWM-HW, NWDO
Todd Anderson, Legal, CO
Mitch Mathews, DMWM, CO
Kelly Smith, DMWM, CO

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.