



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

June 1, 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.

On April 14, 2011, you explained by phone that you had hired Heritage Environmental to transport and dispose of your hazardous waste.

On April 15, 2011, you asked if it would be possible to list the RCRA metals on your hazardous waste manifests and containers instead of paying to sample and analyze the waste. Ohio EPA has determined that this is not the appropriate process for evaluating the waste. Please review the requirements under violation number 2 below for further details regarding proper waste evaluation.

On April 15, 2011, you also explained that Heritage has supplied a distillation unit for you to recycle your methylene chloride/methanol waste. I asked you to provide the specifications for this unit, which you did by email on April 18, 2011.

On April 18, 2011, you responded in writing to Ohio EPA's NOV. You stated that you have done the following:

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- "1. Contacted Heritage Crystal Clean to arrange for the proper transportation and disposal of all waste.
2. Set up containers to properly collect any used rags so that they can be disposed of separately from the stripper waste.
3. Set up a second container to dispose of sludge, stripper, etc.
4. We are in the process of purchasing a new system that filters and recycles all rinse water that virtually eliminates waste there.
5. We are continuing to clean the shop area."

RRC must do the following and submit the required information **within 30 days** of your receipt of this letter:

1. Submit copies of the Heritage waste profiles.
2. Explain how you have evaluated your hazardous waste and what your conclusions are.
3. Submit a photograph of the containers that you are using to accumulate your hazardous waste.
4. Submit photographs documenting the work you have done to clean up the shop.
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)
6. Explained 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.
7. List the specific alcohol that is used to wipe down the stripped pieces.
8. Submit a photograph of the outside area where you stripped pieces, in the past.
9. List all addresses where the rags were burned and describe the method of burning.
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.

Below is a summary of the violations cited in Ohio EPA's March 23, 2011, NOV and your compliance status with respect to each. 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) and**

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

RRC has become an unpermitted hazardous waste disposal facility and unlawfully offered hazardous waste for transportation to a facility without a hazardous waste permit, for the following reasons:

1. For at least four years, RRC has unlawfully disposed of listed hazardous waste methylene chloride and methanol (F002 and F003) on its property from stripping items outside and releasing listed hazardous waste (F002 and F003) from the process described in 2.A. (below) to the land (onto the ground).
2. For at least two years, RRC has unlawfully disposed of listed hazardous waste methylene chloride and methanol (F002 and F003) and waste water from the process described in 2.B. (below) into the pit (in the ground) described in 2.B. (below).
3. For at least four years, RRC has caused the unlawful transportation of listed hazardous waste methylene chloride and methanol coating/paint sludge waste (F002 and F003) generated from the process described in 2.A. (below) to the Crawford County Landfill, a facility that is not permitted to dispose of hazardous waste. RRC placed listed hazardous waste methylene chloride and methanol coating/paint sludge (F002 and F003) into the dumpster at its facility which was then transported off-site by the local solid waste hauler.

In accordance with OAC Rules 3745-55-10 through 3745-55-20, RRC must conduct closure (i.e. clean-up) activities for all areas where hazardous waste has been unlawfully stored and/or disposed of.

You must submit a closure plan which ensures that the closure performance standards set forth in OAC rule 3745-55-11 are met. The closure performance standards require you to remove and remediate contamination at these areas to prevent it from posing a risk to human health and the environment. The closure plan may be prepared in accordance with Ohio EPA's *Closure Plan Review Guidance for RCRA Facilities*. To address this violation, you must submit a closure plan to Ohio EPA for review and approval.

Since RRC violated ORC Section 3734.02(E) and (F), RRC is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55.

Additionally, at any time Ohio EPA may assert its right to have RRC begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

**2. Waste Evaluation
OAC Rule 3745-52-11**

In order to abate this violation, you must immediately evaluate the following wastes, in accordance with the requirements of Ohio Administrative Code (OAC) Rule 3745-52-11 and this letter:

A. Spent methylene chloride/methanol stripper/paint sludge waste. The methylene chloride/methanol solvent mixture is applied to items to be restored in order to remove (strip) coatings (paint, varnish, etc.) from the items. During the inspection, the spent solvent was managed on the stripper table, which drained into a five (5) gallon bucket with a filtering device (coffee can with holes) inside the bucket. The spent solvent, after being filtered, remained in the five gallon bucket and was then subsequently reused in the stripping process. The solvent, when managed in this manner, would not be a waste in accordance with OAC rule 3745-51-04(A)(8). However, when the spent solvent and other materials (coating related wastes, paint sludge) are removed from the unit, they are wastes and must be evaluated in accordance with OAC rule 3745-52-11. In addition to this method, you indicated that items that are too large for the stripping table are processed outside. In these cases, the spent solvent (including paint/coatings sludge) removed would be a waste immediately upon generation.

B. Spent methylene chloride/methanol wash water and paint sludge. Items being restored that have spent methylene chloride/methanol (including coating/paint sludge) on them are placed on a rinse table and washed with water. The spent water and methylene chloride/methanol solvent is drained to a pit through a drain in the rinse table. This pit is located in the ground inside the shop, beside the rinse table. It was filled with waste on the day of my March 14, 2011, inspection.

C. Spent stripper rags. Methanol is applied to wipes (rags). These methanol soaked wipes are used to remove de minimis amounts of water/methylene chloride from the items being restored.

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You must obtain a representative sample of the waste at the facility, according to OAC Rule 3745-51-20. You must evaluate all samples, through laboratory analysis, for at least the Toxicity Characteristic Leaching Procedure (TCLP) metals. Through a review of the Material Safety Data Sheets (MSDS) and the processes generating the wastes, Ohio EPA has determined that wastes described in paragraphs A and B above are, at least, listed hazardous wastes F002 (methylene chloride) and F003 (methanol) as described in OAC Rule 3745-51-31. You must submit the results of the laboratory analyses to Ohio EPA as soon as they are available. **RRC will need to give Ohio EPA a five day advance notice of sampling activities, in order for an inspector to make arrangements to view the sampling.**

RRC remains in violation of OAC Rule 3745-52-11 until its hazardous waste is evaluated in accordance with the requirements of the rule.

Ohio EPA was not able to determine your hazardous waste generator status at the time of the investigation and inspection. It is Ohio EPA's belief that RRC was operating as a hazardous waste small quantity generator. Unless you can demonstrate otherwise, as a small quantity generator, RRC would also be in violation of numerous other hazardous waste rules regarding the proper management of hazardous waste at a facility. Therefore, you must provide the following information immediately:

1. The amount of wash water generated in a month.
2. The amount of waste paint, finish, and methylene chloride generated in a month.
3. The amount of rags generated in a month.

In order to make these determinations you may list the typical amounts and the amount in a month in which the maximum stripping/washing work is done in the system. Also, please submit a record of the methylene chloride solvent that RRC has purchased over the last two years.

After Ohio EPA determines your generator status, I will inform you of any other violations in a separate letter.

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If you have any questions, please feel free to contact me at (419) 373-3074. RRC has been assigned an EPA Identification number for tracking purposes only.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
Todd Anderson, Legal, CO
Mitch Mathews, DMWM, CO
DMWM-HW, NWDO File, Crawford County, Ridgerton Restoration File }

ec: Don North, DMWM, 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.