



**Environmental
Protection Agency**

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

Re: Ridgeton Restoration
Crawford County
Complaint #3058
Hazardous Waste
Notice of Violation

March 23, 2011

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

Dear Mr. Blank:

Thank you for accompanying me during Ohio EPA's March 14, 2011, complaint investigation (CI) and compliance evaluation inspection (CEI) of The Ridgeton Restoration Company, Ltd. (RRC) located at 1411 North Sandusky Avenue in Bucyrus, Ohio. I inspected RRC to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). My inspection included observations of facility operations and a review of written documentation. This letter will explain the violations I found and what you need to do to correct the violations.

According to the complaint, received by Ohio EPA on March 9, 2011, RRC was dumping hazardous waste into a hole in the ground inside the shop and a gravel area behind the building. This letter will also explain the validity of the complaint.

RRC performs building restoration. The company performs much of its work at the building location. Much of its work is at churches, but it also restores fire and flood damaged homes. At these various locations, RRC repairs and restores drywall, plaster, wood floors and provides painting services. RRC also restores furniture, such as church pews, at remote locations.

At its Bucyrus location, RRC strips clear finish and paint from wood pieces, such as doors, using a mixture of methylene chloride and methanol. It also performs carpentry work on damaged furniture, including re-gluing pieces, sanding and re-finishing.

RRC has made a stripping table, where pieces are placed and brushed with a methylene chloride stripper applicator. The methylene chloride stripper and brush help to remove the clear finish or paint. The liquid methylene chloride stripping agent runs down the table and flows into the stripper pail. The stripper is re-circulated. The semi-solid paint and finish waste accumulates on the table or in the pail of stripper. A slotted coffee can is placed into the methylene chloride stripper pail to collect paint waste and keep it out of the re-circulating pump. You explained that the stripper evaporates and you add more to the pail over time.

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Some pieces may be rinsed over another table to remove the semi-solid paint and finish waste. Then the piece may be brushed with stripper again. The water from this table is drained into a hole in the ground. The hole was covered with plywood at the time of my investigation and inspection. According to you, there is half of a 55-gallon drum in the hole; however, it was overflowing with waste, at the time of my investigation and inspection. Therefore, waste methylene chloride has been released to the ground. According to you, some stripping has been performed outside and waste methylene chloride would have been released to the ground during this operation also.

You explained that the last step in the process is to wipe down the wood piece with alcohol, using rags. This step removes all the residual methylene chloride, so the new finish will adhere to the wood. You stated that you have been burning the rags at your home.

When the paint waste builds up it is scraped from the table and placed into a coffee can. When the coffee can in the stripper pail is filled, it is removed. In both cases, saw dust is added to the waste to solidify it and the resulting methylene chloride and saw dust waste is placed into the trash. You stated that the landfill can't accept liquids, and this is the reason why you solidify your methylene chloride waste. Based on all this, Ohio EPA has determined that the complaint is valid.

As a result of my complaint investigation and inspection, I found the following violations of Ohio's hazardous waste laws. 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)**

No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any of the following: (1) A hazardous waste facility operating under a permit issued in accordance with this chapter; (2) A facility in another state operating under a license or permit issued in accordance with the "Resource Conservation and Recovery Act of 1976" 90 Stat. 2806, 42 U.S.C.A. 6921, as amended.

RRC has become an unpermitted hazardous waste disposal facility by: unlawfully disposing of the listed hazardous waste methylene chloride and methanol (F002 and F003) on its property for at least four years for the solvent waste and two years for the hazardous waste water and burning hazardous waste rags at your home. Also, for four years, RRC has unlawfully transported hazardous waste to the Crawford County Landfill, a facility that is not permitted to dispose of hazardous waste. This waste may also possess the characteristic of toxicity for heavy metals. HNA must immediately cease this unpermitted disposal and transportation of hazardous waste.

RRC must immediately arrange for the lawful accumulation and transportation of its hazardous waste to a permitted hazardous waste treatment, storage or disposal facility. You must explain to Ohio EPA, in advance, what treatment, storage or disposal facility you may send it to. RRC must also provide documentation that describes the procedures that will be taken, immediately; to ensure that unpermitted disposal and transportation of hazardous waste does not happen again.

Since RRC has violated ORC Section 3734.02(E) & (F) by becoming an unpermitted storage facility (TSD), it is subject to OAC Rules 3745-55-10 through 3745-55-48 and 3745-55-97.

RRC also is subject to all applicable general facility standards, found in OAC Chapters 3745-54 and 55, until such time as RRC has demonstrated that it has ceased operations as a disposal facility. 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

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24; or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used. RRC failed to adequately evaluate its stripping waste, wash water, and rags.

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

- A. Methylene chloride stripper waste. This is the liquid/sludge that is removed from the wood objects. It is found on the stripper table, floor and stripper pail.
- B. Methylene chloride wash water. This is the waste from the washing operation, including liquid/sludge sprayed off of wood objects onto the wash table or into the wash water pit in the ground and all liquid associated with the washing operation.
- C. Stripper rags. These are the waste rags used to remove residual methylene chloride from the wood objects.

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), Ohio EPA has determined that these wastes are at least the hazardous wastes F002 (methylene chloride) and F003 (methanol). 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.**

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Ohio EPA was not able to determine your hazardous waste generator status at the time of the investigation and inspection. Therefore, you must provide the following information:

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.

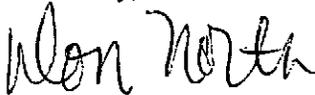
Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed. I have enclosed copies of the following documents to assist you in properly managing your spent lamps: Fluorescent Lamps: What You Should Know and Computer, Fluorescent Lamp and Ballast Recyclers. I recommend that you review these documents carefully and contact me if you have any questions. The first document describes the rules you must follow in order to manage lamps as a universal waste. You may be able to further 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 and you may possibly reduce your regulatory requirements. I have enclosed a copy of Pollution Prevention Opportunities, a worksheet that can help you recognize opportunities for reducing waste and conserving energy at your business. I have also enclosed copies of the fact sheet Management of Electronic Waste from Businesses. Please review this information and contact me if you have any questions. 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 the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage. Please feel free to share this information with your colleagues.

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

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You can find copies of the rules and other information on the division's web page at
<http://www.epa.ohio.gov>. Ohio EPA also has helpful information about pollution prevention at
<http://www.epa.ohio.gov/ocapp>.

Sincerely,



Don North
District Representative
Division of Hazardous Waste Management

/lr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
~~DHWM, NWDO File, Crawford County, Ridgeton Restoration File (New)~~

ec: Don North, 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.

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number:		Website: www.ridgetonrestoration.com (Optional)	
Site Location Information	Name: The Ridgeton Restoration Co., Ltd.			
	Street Address: 1411 North Sandusky Ave.			
	City, Town, or Village: Bucyrus		State: OH	
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Crawford		Zip Code: 44820	
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>
Municipal <input type="checkbox"/>		State <input type="checkbox"/>	Other <input type="checkbox"/>	

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Pat		MI:	Last Name: Blank	
	Title: Owner				
	Phone Number: 419-569-5988			Phone Number Extension:	
	E-Mail Address:				
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

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	Name of Site's Legal Owner:				Date Became Owner (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:				Owner Phone #:		Country:			Zip Code:			
	State:				Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):			
	Operator 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 #:		Country:			Zip Code:			
State:				State:					Country:				Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Ridgeton Restoration Co., Ltd. **Facility Type:** LQG SQG CESQG TSD **Date of Inspection:** 3-4-11 **EPA ID#:**

Waste Generated		On- or Off-Site Management			P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Solvent stripping process for removing paint and finish from wood objects	Waste stripper, containing methylene chloride and methanol, and paint /finish F002 & F003	5-10 gallons	Disposed on the floor and ground	This waste has been sent to the Crawford County Landfill.	
2	Washing wood pieces prior to a second stripper application.	Waste stripper, containing methylene chloride and methanol, paint/finish and water F002 & F003	Unknown at this time. Generator must measure and report this amount	Disposed in a hole in the ground.	This waste is disposed in a hole in the ground and solid phase waste removed from the hole is sent to the Crawford County Landfill.	
3	Rinsing wood pieces to remove residual methylene chloride	Waste rags containing methylene chloride F002	Unknown at this time. Generator must measure and report this amount	Burned at a residential property	This waste has been open burned at the owners home.	
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REMARKS **GENERAL INFORMATION**

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *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: