



State of Ohio Environmental Protection Agency

Northwest District Office

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

September 29, 2009

Re: Sandusky Register
OHD004465894
Erie County, NWDO
NOV

Ms. Jane Righi, Business Office Manager
Sandusky Register
314 West Market Street
Sandusky, Ohio 44870

Dear Ms. Righi:

On September 15, 2009, I inspected the Sandusky Register's facility located at 314 West Market Street in Sandusky, Ohio. I inspected Sandusky Register to determine the facility's 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 a tour of the facility as well as a review of facility records. I also helped Sandusky Register identify ways to prevent pollution by reducing waste the facility generates.

Sandusky Register is a newspaper publisher. Operations at this location include printing, publishing and distribution of newspapers. Mr. Ric Miller, press manager, provided a tour of the facility. Mr. Mike Lippus, production manager, also provided information during the facility tour. Disposal records could not be located at the time of the inspection. Therefore, the facility generator status has not yet been determined.

Wastes generated at the facility include parts washer solvent from one parts washer located in the production area, hydraulic oils from the production area, oils/inks from the press area, and fluorescent lighting from throughout the facility.

Mr. Lippus indicated that the parts washer is filled with a biodegradable cleaning solution which is seldom used. To Mr. Lippus' recollection, waste has not been generated from the parts washer in several years. Mr. Lippus also indicated that the facility gives waste hydraulic oil to a local garage shop owner who burns the waste hydraulic oil in a used oil furnace. Mr. Lippus did not know the name of the local garage. Lastly, Mr. Lippus indicated that the facility disposes of the facility lighting fixtures in the solid waste compactor.

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Mr. Miller indicated that the facility regularly disposes of approximately 55 gallons of waste oils/ink from the printing area every few months. Mr. Miller indicated that the facility uses soy based inks in the printing process. Mr. Miller did not know the name of the disposal facility.

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. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "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. Sandusky Register has failed to evaluate the waste oils/ink from the printing area to determine if they are hazardous waste. Sandusky Register could not provide an analysis of the waste nor records for the disposal of the waste at the time of the inspection.

Sandusky Register must immediately determine if the waste oils/ink from the printing area are hazardous waste.

If the waste oils/ink from the printing area is hazardous waste, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

To abate this violation, Sandusky Register must analyze a representative sample of the waste oils/ink from the printing area for total volatile organic compounds (VOC's) total RCRA metals and flash point using methods as outlined in U.S. EPA's SW-846.

- b. Sandusky Register has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Sandusky Register is currently disposing of these fluorescent lamps as solid waste.

Sandusky Register must immediately cease disposing of the spent fluorescent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent fluorescent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

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Sandusky Register has the option of handling spent fluorescent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

To abate this violation, Sandusky Register must choose one of the following options for the spent fluorescent lamps:

i. Disposal Option:

Sandusky Register may manage the lamps as a hazardous waste. Sandusky Register must sample each type and brand of lamp used at the facility for Resource Conservation and Recovery Act (RCRA) metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Sandusky Register must ensure that all spent fluorescent lamps that are determined to be hazardous waste are disposed of at a permitted hazardous waste disposal facility. Sandusky Register must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. Recycling Option:

In lieu of evaluating and disposing of the spent fluorescent lamps, Sandusky Register may manage spent fluorescent lamps as universal waste. Universal waste spent fluorescent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)". Sandusky Register must also track the accumulation of the spent lamps to ensure spent lamps are not stored for greater than 365 days. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first lamp is placed in the container).

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Sandusky Register should choose the recycling option, you should submit to me updated photos of the properly labeled and closed containers as well as the name of the recycling facility Sandusky Register intends to use.

I have enclosed the following fact sheets on spent lamps: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated July 2009 for your use.

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Sandusky Register must submit the results of the analysis of the waste oils/ink from the printing area to me. In addition, Sandusky Register must identify how the facility intends to properly manage the facility's spent fluorescent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

In addition to the above violations, Sandusky Register must address the following concerns:

1. At the time of the inspection, Sandusky Register could not locate any records for the disposal or recycling of the used hydraulic oil generated at the facility. In accordance with OAC Rule 3745-279-11, Sandusky Register may do one of the following with the used hydraulic oil generated at the facility:
 - a. **Analyze a representative sample of the used hydraulic oil for total Arsenic, Cadmium, Chromium and Lead, flash point and total Halogens using methods as outlined in U.S. EPA's SW-846. If the used oil meets the specifications listed in Table 1 of OAC Rule 3745-279-11 than the facility may market the used hydraulic oil to a used oil burner, or**
 - b. **Burn the used hydraulic oil in an on-site used oil space heater in accordance with OAC Rule 3745-279-23, or**
 - c. **Transport the used hydraulic oil to an approved used oil collection center in accordance with OAC Rule 3745-279-24.**

Sandusky Register must choose one of the above options. Sandusky Register should submit this information to my attention at the Ohio EPA within 30 days of receipt of this letter.

I have enclosed the following fact sheets on used oil: The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, dated April 2006; Registered Used Oil Collection Centers, dated September 9, 2009; and Common Used Oil Management Standards, for your use.

2. At the time of the inspection, Sandusky Register could not locate any records for the parts washer solvent used in the production area. Sandusky Register should locate a Material Safety Data Sheet (MSDS) and any disposal or recycling records for the parts washer solvent used in the production area.

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Sandusky Register should submit this information to my attention at the Ohio EPA within 30 days of receipt of this letter.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, we observed potential pollution prevention (P2) opportunities associated with your operations. In addition to recycling the fluorescent lamps, P2 options that you may want to evaluate for these operations include the reduction in the number of parts washers used in the service area and/or the substitution of a water based solvent for the solvent based parts washer solvent currently used.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://development.ohio.gov/cdd/oeef>.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at the number listed below. Ohio EPA has helpful information about this at the following web address: <http://epa.ohio.gov/ocapp>.

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (419-373-3056). You can find copies of the rules and other information on the division's web page at: <http://epa.ohio.gov/dhwm>.

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management

/csl

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
· DHWM, NWDO File – Erie County General

ec: Gary Deutschman, DHWM, NWDO

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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

<p>Site EPA ID No. Site Name</p> <p>Site Location Information</p> <p>Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html</p>	<p>EPA ID Number: OHD004465894 Name: Sandusky Register Website: sanduskyregister.com (Optional)</p> <p>Street Address: 314 West Market Street City, Town, or Village: Sandusky County Name: Erie State: OH Zip Code: 44870</p> <p>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"/></p> <p>511110</p>
<p>Facility Representative</p> <p>Additional names can be recorded in number 12</p> <p>Only provide address information if it is different than the site address</p>	<p>First Name: Ric MI: Last Name: Miller Phone Number: 312-555-1212 Phone Number Extension: E-Mail Address: Fax Number: Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:</p>
<p>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</p>	<p>Name of Site's Legal Owner: Sandusky Newspapers Inc. Date Became Owner</p> <p>Owner Private County District Federal Indian Municipal State Other Type: <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: 314 West Market Street City, Town or Village: Sandusky Owner Phone #: State: Oh Country: Zip Code: 44870 Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Owner Private County District Federal Indian Municipal State Other Type: <input type="checkbox"/> <input type="checkbox"/></p> <p>Street or P.O. Box: City, Town or Village: State: Operator Phone #: United States Zip Code:</p>

VIOLATIONS CITED? Yes No

TYPE OF HANDLER- A MINIMUM OF ONE BOX MUST BE CHECKED

<p><input type="checkbox"/> Not a HW Generator</p>	<p><input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11</p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input type="checkbox"/> Conditionally Exempt Small Quantity Generator</p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED) (CHECK ALL BOXES THAT APPLY)	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> 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
<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))
<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
<input type="checkbox"/> 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 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.

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Mike Lippus
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Gary Deutschman		9/15/2009

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)

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Sandusky Register	Facility Type: Used Oil/ Fluorescent Bulbs	Date of Inspection: 9/15/09	EPA ID #: OHD 004 465 894
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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 <small>(container, tank, etc) and location of waste accumulation area</small>	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 Printing	Waste Inks/Oils	15 gallons				
2 Lighting	Used Fluorescent Lamps					
3 Maintenance	Used Parts Washer Solvent					
4 Maintenance	Used Hydraulic Oil					

REMARKS-GENERAL INFORMATION

General Process Information: Sandusky Register is a newspaper publisher

Regulatory/Enforcement History (if applicable): None

Additional P2 remarks and information:

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

*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:

**Common Used Oil Management Standards
(Ohio Administrative Code Chapter 3745-279)**

Handler Type Mgmt. Standards	<u>Generator/</u> <u>Collection Center</u>	<u>Transporter/Transfer</u> <u>Facility</u>	<u>Off-Spec Burner</u>	<u>Processor/ Re-refiner</u>	<u>Marketer*</u>
Storage	<u>3745-279-22(A)&(B)</u>	<u>3745-279-45(B)&(C)</u>	<u>3745-279-64(A)&(B)</u>	<u>3745-279-54(A)&(B)</u>	N/A
Labels	<u>3745-279-22(C)</u>	<u>3745-279-45(G)</u>	<u>3745-279-64(F)</u>	<u>3745-279-54(F)</u>	N/A
Secondary Containment	No requirements	<u>3745-279-45(D),(E)&(F)</u>	<u>3745-279-64(C),(D)&(E)</u>	<u>3745-279-54(C),(D)&(E)</u>	N/A
Response to Releases	<u>3745-279-22(D)</u>	<u>3745-279-45(H)</u>	<u>3745-279-64(G)</u>	<u>3745-279-54(G)</u>	N/A
Closure	No requirements	No requirements	No requirements	<u>3745-279-54(H)</u>	N/A
<u>Notification/</u> <u>EPA ID</u> <u>Number</u>	No requirements (Non-Do-It-Yourself collection centers must <u>register</u> with the state)	<u>3745-279-42</u>	<u>3745-279-62</u>	<u>3745-279-51</u>	<u>3745-279-73</u>
Tracking	No requirements	<u>3745-279-46</u>	<u>3745-279-65</u>	<u>3745-279-56</u>	<u>3745-279-74</u>

* OAC rules 3745-279-70 to 3745-279-75 apply to used oil marketers. Any person subject to the marketer requirements must also comply with one of the following:

1. used oil generator requirements;
2. used oil transporter/transfer facility requirements;
3. used oil processor and re-refiner requirements; or
4. used oil burner requirements.

Therefore, rules concerning storage, labels, secondary containment, release response and closure are only applicable to marketers through the other handler requirements.