



Environmental  
Protection Agency

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

Re: Bluffton Flying Service  
OHR000027532  
Hazardous Waste  
Hancock County  
NOV

August 24, 2011

Mr. Don Schumann, Service Department  
Bluffton Flying Service  
1080 Navajo Drive  
Bluffton, Ohio 45817

Dear Mr. Schumann:

Thank you for accompanying me during Ohio EPA's August 4, 2011, hazardous waste compliance evaluation inspection (CEI) of Bluffton Flying Service (BFS) located at 1080 Navajo Drive, Bluffton, Ohio. I inspected BFS to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violations I found and what you need to do to correct these violations.

Amalgamated Leasing, Inc. (DBA Bluffton Flying Service) had notified Ohio EPA on March 27, 1998, that they were a small quantity generator of hazardous waste (D001, D006, D008, D018, D027, D039, D040) at this address. You stated that this facility moved two years ago and now this facility was solely BFS. You also stated that that Amalgamated Leasing, Inc. had two paint booths (thus the reason for notification) but were gone when the facility moved.

BFS is a flying school and an aircraft service shop. BFS only provides repairs and does not conduct aircraft body work. BFS is a used oil generator and a conditionally exempt small quantity generator of hazardous waste (D001). Hazardous waste generated at the facility is from parts washing solvent used to clean parts. Other wastes generated at your facility include used oil filters, used oil, lead-acid batteries and lamps.

During the inspection, I gave you the following information: the Ohio EPA fact sheets Universal Waste Rules for Handlers of Lamps; Fluorescent Lamps: What you Should Know; The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil; a list of used oil recyclers; a list of used oil collection centers, a sample universal waste management plan for lamps, a list of lamp recyclers across the U.S.A. and a list of lamp recyclers in Ohio.

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

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

BFS failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

BFS is currently disposing of their fluorescent bulbs in the trash. BFS must cease disposing of their fluorescent bulbs as non-hazardous waste in the local landfill until a proper waste evaluation has been completed or begin managing as a universal waste.

A waste evaluation can be conducted by taking a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. BFS must ensure that the laboratory chosen to perform this sampling utilizes the proper method(s) to evaluate these bulbs. BFS must sample the fluorescent bulbs to determine the Toxicity Characteristic Leaching Procedure (TCLP) concentrations of barium (D005), cadmium (D006), lead (D008), and mercury (D009) as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846.

If the bulbs are determined to be hazardous through a proper waste evaluation, BFS 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). FTC 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, BFS 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 inspection for more information. If you choose this option, please provide me an outline of your universal waste management plan (see the sample universal waste management plan given to you during the CEI).*

- ***To abate this violation, please submit to me your waste evaluation of your lamps (either proper characterization from the manufacturer or your sampling analytical) or an outline of your universal waste management plan (indicating how you will manage, label, send off-site within one year, where lamps will be recycled, etc.)***

**2. Used oil storage requirements - proper labels.  
OAC Rule 3745-279-22 (C) (1)**

Containers used to store used oil shall be labeled or marked clearly with the words "Used Oil."

BFS failed to mark their used oil tote containing used oil and the bucket (approximately 5-gallons) which collects used oil from the draining of their used oil filters with the words "Used Oil".

- ***Both these containers were labeled "Used Oil" during the CEI on August 4, 2011, thus this violation is abated.***

**3. Off-site shipments of used oil by generators.  
OAC Rule 3745-279-24**

Generators shall ensure that their used oil is transported only by transporters who have obtained U.S. EPA identification numbers.

You stated that your used oil is not being picked up by a transporter with a U.S. EPA identification number. Currently, a guy from Autobahn Garage LLC (Autobahn) in Findlay, Ohio comes and picks up your tote of used oil once a year (approximately 55-gallons a year) to burn in his used oil burner. Autobahn has not notified Ohio EPA that they are a used oil recycler, used oil collection center or marketer, thus they do not have a U.S. EPA identification number and BFS is unable to give their used oil to Autobahn.

Used oil generators have three options for handling their used oil: 1) Generators must have their used oil transported by an entity that has a U.S. EPA identification number and ensure their used oil is recycled; 2) Generators may transport less than 55-gallons of their own used oil to a registered used oil collection center; or 3) generators may burn their own used oil in an on-site space heater as long as all applicable requirements are met. Please consult the Used Oil fact sheets given to you during the inspection for more information.

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- ***In order to abate this violation, you must either 1) submit a copy to me of a contract or some type of documentation indicating a transporter with a U.S. EPA identification number will be picking up your used oil and appropriately recycling it in the future; or 2) a disposal receipt from the off-site shipment of your used oil (if the facility is due for a pick-up) indicating that a transporter with a U.S. EPA identification number is now transporting your used oil and that the used oil is taken to an appropriate recycling facility; or 3) you must submit a copy of a receipt from the drop-off of your used oil at a registered used oil collection center or 4) a summary outlining how you plan to manage your used oil if you decide to purchase a used oil furnace. Please consult the list of used oil recyclers and collection centers given to you during the CEI.***

#### **Pollution Prevention:**

BFS is recycling their properly drained used oil filters as scrap metal with a salvage yard in Cridersville and their lead acid batteries with Lima Battery Warehouse.

If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. Or if you would like a free, non-regulatory on-site pollution prevention assessment or more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about this at the following web address:  
<http://www.epa.ohio.gov/ocapp/>

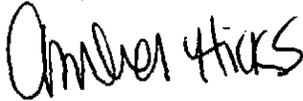
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link  
[http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](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.

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio EPA, 347 N. Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419) 373-3082 or email at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

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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/dmwm.aspx>.

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

Enclosures

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
DMWM-HW, NWDO File: Hancock County General ↗

ec: Amber Hicks, 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.

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	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](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b>	EPA ID Number: <b>OHR000027532</b>		Website: <b>www.blufftonflyingservice.com</b> (Optional)	
<b>Site Location Information</b>	Name: <b>Bluffton Flying Service</b>		Street Address: <b>1080 Navajo Drive</b>	
<b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	City, Town, or Village: <b>Bluffton</b>	State: <b>OH</b>	County Name: <b>Hancock</b>	
	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"/>
	Zip Code: <b>45843</b>			

<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Don</b>	MI:	Last Name: <b>Schumann</b>
	Title:		
	Phone Number: <b>419-358-7045</b>		Phone Number Extension:
	E-Mail Address:		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:		Zip Code:

<b>Legal Owner And Operator of the Site.</b> 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 #:	
	State:		Country:	
	Zip Code:		Date Became Operator (mm/dd/yyyy):	
	Name of Site's Operator:		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:			Operator Phone #:
	City, Town or Village:		Country:	
	State:		Zip Code:	

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>		
<input type="checkbox"/> Not a HW Generator	<input 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). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" 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

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

**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**

Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

**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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D001**

**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:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
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)
Amber Hicks		08/4/2011 11:10

**Comments:**