



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: American Sign
~~OH 986986370~~ OHR 000159582
Lucas County
Hazardous Waste
Notice of Violation

April 8, 2010

Ms. Randi McClintock, Owner
American Sign
205 W. Alexis Road
Toledo, Ohio 43612

Dear Ms. McClintock:

Thank you for accompanying me during portions of Ohio EPA's March 11 and 12, 2010, complaint investigations (CI) and compliance evaluation inspections (CEI) of American Youth for Christ (AYFC) and Crutchfield Trucking, located at 205 W. Alexis Road in Toledo, Ohio. In the process of conducting the complaint investigations and inspections noted above, I determined it was necessary to also conduct an inspection of the American Sign facility and its operations. I inspected American Sign 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. This letter will explain the violation I found and what you need to do to correct the violation.

American Sign operates its sign business from this facility and also leases space in its building to other businesses. On March 12, 2010, I observed at least 10 drums of unknown waste in the back of your property.

Therefore, as a result of my inspection, I found the following violation of Ohio's hazardous waste laws. In order to correct this violation, 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**

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. American Sign has failed to adequately evaluate all of its waste properly. Specifically, I observed at least 10 drums of unknown waste on pallets in the rear of your facility that had not been identified or properly evaluated. You have stored these drums of unknown waste for at least six months.

Ms. Randi McClintock
April 8, 2010
Page Two

In order to abate this violation, you must immediately evaluate the wastes on the pallets in the rear property, and any other waste discovered at the facility by Ohio EPA or American Sign, in accordance with the requirements of Ohio Administrative Code Rule 3745-52-11 and this letter. You must obtain a representative sample of the waste in each container, according to OAC 3745-51-20. You must evaluate all samples, through laboratory analysis, for at least the Toxicity Characteristic Leaching Procedure (TCLP) metals, TCLP VOCs, TCLP SVOCs, flash point and pH, and submit the results of the laboratory analyses to Ohio EPA as soon as they are available.

American Sign 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.

Your results must document if the waste is hazardous or not and whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage or disposal facility you will send it to. American Sign must submit to me a legible copy of the manifest(s), signed by a representative of the permitted treatment, storage or disposal facility that documents the proper off-site shipment of all its hazardous waste. If non-hazardous waste is identified, American Sign must submit a copy(s) of the shipping papers used to transport the waste off-site to a permitted solid waste facility. **If the waste is hazardous, I will determine the status of your facility's compliance with other hazardous waste laws and notify you of my findings in a separate letter.**

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

Sincerely,



Don North
District Representative
Division of Hazardous Waste Management

/lb

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
Rev. Jamin Hurd, AYFC

~~DHWM, NWDO, Lucas County, AYFC File~~
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 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 kristina.durnell@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: _____ Name: American Sign Website: _____ (Optional)																	
Site Location Information	Street Address: 205 W. Alexis Road																	
	City, Town, or Village: Toledo	State: OH																
	County Name: Lucas Zip Code: 43612																	
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Private</td> <td style="text-align: center;">County</td> <td style="text-align: center;">District</td> <td style="text-align: center;">Federal</td> <td style="text-align: center;">Indian</td> <td style="text-align: center;">Municipal</td> <td style="text-align: center;">State</td> <td style="text-align: center;">Other</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>							
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Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Ms. Randi MI: _____ Last Name: McClintock	
	Phone Number: 419-290-2799 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): _____																													
	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Owner Type:</td> <td style="text-align: center;">Private</td> <td style="text-align: center;">County</td> <td style="text-align: center;">District</td> <td style="text-align: center;">Federal</td> <td style="text-align: center;">Indian</td> <td style="text-align: center;">Municipal</td> <td style="text-align: center;">State</td> <td style="text-align: center;">Other</td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other		<input type="checkbox"/>	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Federal</td> <td style="text-align: center;">Indian</td> <td style="text-align: center;">Municipal</td> <td style="text-align: center;">State</td> <td style="text-align: center;">Other</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>											
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	Name of Site's Operator: _____ Date Became Operator (mm/dd/yyyy): _____																													
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	City, Town or Village: _____																													
	State: _____																													
	Operator Phone #: _____ Country: _____ Zip Code: _____																													

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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"/> 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

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- Small Quantity Handler of Universal Waste Destination Facility for Universal Waste
 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. Oil
 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 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.

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

Announced Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Don North

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
03/12/2010

Comments:

American Sign owns the whole property at 205 W. Alexis Road. They have subdivided the property and have various tenants. American Sign occupies the front office and shop.