



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

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www.epa.state.oh.us

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

January 2, 2008

**HOCKING COUNTY  
GENERAL FILE  
(OSBURN ASSOCIATES, INC.)  
DHWM/SEDO  
OHR000128066**

Mr. Casey Burdette  
Osburn Associates, Inc.  
11931 State Rte. 93N  
Logan, Ohio 43138

Dear Mr. Burdette:

On December 21, 2007, I performed a compliance inspection at your facility located at 11931 State Route 93 N, Logan, to determine its compliance with Ohio's hazardous waste and solid waste laws and regulations as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain the hazardous waste violations I found and what you need to do to correct the violations.

Based on this inspection, you are in violation of the following hazardous waste laws and regulations:

- (1) **OAC Rule 3745-52-11, Evaluation of Wastes:** Any person who generates a waste in the State of Ohio, as defined in rule 3745-51-02 of the Administrative Code, ...shall determine if that waste is a hazardous waste using the following method: (A) He shall first determine if the waste is excluded from regulation under rule 3745-51-04 of the Administrative Code; (B) He shall then determine if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code; and (C) For purposes of compliance with Chapter 3745-270 of the Administrative Code, or if the waste is not listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code, the generator shall then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by either:
  - (1) Testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator of U.S. EPA pursuant to 40 CFR 260.21; or
  - (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the process used.

**Spent waste liquids from Osburn Associates, Inc. anodizing dip tank have not been evaluated to determine if they are a hazardous waste. In order to demonstrate compliance with this rule, Osburn Associates, Inc. must evaluate**

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**the spent dip tank waste liquid(s) to determine if they are a hazardous waste and manage them accordingly. Please submit documentation to this office showing the waste evaluation analytical information for the spent dip tank waste liquid.**

Please provide the documentation required above **within 30 days of the date of this letter.**

If you find 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, and you may possibly reduce your regulatory requirements. The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You may benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>. If you would like to be considered for an in-depth on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, please contact me at (740) 380-5262. Enclosed you will find a copy of the checklists that were completed as a result of the December 21, 2007 inspection. If you have any questions regarding waste management or pollution prevention activities, please feel free to call me at (740) 380-5262.

Sincerely,



John Rochotte  
District Representative  
Division of Hazardous Waste Management

JR/mlm

Attachments

**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.

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

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

Site EPA ID No.	EPA ID Number: OHR000128066								
Site Name	Name: Osburn Associates, Inc				Website: osburnsigns.com (Optional)				
Site Location Information	Street Address: 11931 State Rte. 93N								
	City, Town, or Village: Logan				State: OH				
	County Name: HOCKING				Zip Code: 43138				
Site Land Type (check only one)	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"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	339950								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: Casey			MI:	Last Name: Burdette				
	Phone Number: 800-523-8917				Phone Number Extension:				
	E-Mail Address: ceburdette@osburnassociates.net								
	Fax Number: 740-385-7592				Fax Number Extension:				
	Street or P.O. Box: P.O. Box 912								
	City, Town or Village: Logan				State: OH				
					Country: USA		Zip Code: 43138		
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: Osburn Associates, Inc.				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	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"/>
	Street or P.O. Box: P.O. Box 912								
	City, Town or Village: Logan				Owner Phone #: 800-523-8917				
	State: OH				Country: USA		Zip Code: 43138		
	Name of Site's Operator: Osburn Associates, Inc				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	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"/>
	Street or P.O. Box: P.O. Box 912								
	City, Town or Village: Logan				Operator Phone #: 800-523-8917				
	State: OH				Country: USA		Zip Code: 43138		
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Type of Generator	<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator				
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
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 generated and/or accumulated (check all boxes that apply))					
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste					
(Check all boxes below that apply for each of the three types of facilities above)			Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Generated	Accumulated	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil	
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner	
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor		
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:		
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments:		
Containers	<input type="checkbox"/> Yes	<input type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
John Rochotte				12/21/2007	
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 DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Osburn Associates. Inc.

**Facility Type:** UNKNOWN

**EPA ID#:** OHR000128066

### Description of Waste

### On-Site Management

### Off-Site Management

Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting; etc)</small>		Waste Generated <small>(e.g. sludge, spent solvent, ash; etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1	routine operations	paper/trash	NA	? (emptied weekly)	container	NA	trash container located outside	Farmer's Refuse, Logan, OH
2	Aluminum prep for painting.	Waste anodizing liquid (Ridoline/Alodine)	?	5000 gals generated twice per year	tanks	NA	Outside of bldg.	Vickery Waste Mgmt., Vickery, OH
3	Equipment Maintenance/production	scrap metal	NA	< 100 lbs.	container	NA	container outside of facility	recycled to local recycler.
4	Lighting	Spent fluorescent lamps	D009	< 1	Container to be designated	NA	Container to be designated	Waste Management company to be determined.

## REMARKS - GENERAL INFORMATION

### **General Process Information:**

Osburn Associates, Inc. produces road signs for local, county and state roads. The facility consists of a large open production area where aluminum in coils and sheets is cut into the desired sign dimension. The sign blanks are then loaded in a rack that is lowered into a large dip tank for anodizing prior to screen painting. There is an area where the signs are painted and then dried and prepared for shipping to customers. An office/engineering area adjoins the main shop area.

A building on the other side of Rte. 93 produces PVC pipe bends and fittings for electrical PVC conduit. This facility has cutters, benders, etc for the PVC pipe. A storage building also exists near the sign mfg bldg.

**Regulatory/Enforcement History (if applicable):** NA

# CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

## WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11]  Yes  No  NA  
Waste liquid in poly tanks at the facility has not been evaluated to determine if it is hazardous waste.

## GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month?  Yes  No  NA  
[conditionally exempt small quantity generator ("CESQG")]  
Unknown at this time (see OAC 3745-52-11 violation above).

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG").

## OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD?  Yes  No  NA  
[3734.02(F)]

## TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a :
- a. Container that meets 3745-66-70 to 3745-66-77?  Yes  No  NA
  - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)  Yes  No  NA
  - c. Drip pad that meets 3745-69-40 to 3745-69-45?  Yes  No  NA
  - d. Containment building that meets 3745-256-100 to 3745-256-102?  Yes  No  NA

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use the LDR checklist.

## REMARKS