



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

June 12, 2007

**JACKSON COUNTY  
GENERAL FILE  
(A. P. GREEN INDUSTRIES, INC)  
DHWM/SEDO  
OHD004282760**

Mr. John Crooks  
A. P. Green Industries, Inc.  
1627 Pyro Road  
Oak Hill, Ohio 45656

Dear Mr. Crooks:

On May 31, 2007, I performed a compliance inspection at your facility located at 1627 Pyro Road, Oak Hill, Jackson County, 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 we 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 3745-273-15(C) Accumulation Time Limits – Standards For Small Quantity Handlers of Universal Waste:** (C) A Small Quantity Handler of Universal Waste who accumulates universal waste shall be able to demonstrate the length of time that universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:  
(1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received; (2) Marking or labeling each individual item of universal waste (e.g. each battery or thermostat) with the date it became a waste or was received; (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste or was received; (4) maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received; (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

A. P. Green Industries, Inc. did not label the universal waste container of spent fluorescent lamps, in violation of this rule. The container was labeled during the inspection, therefore, A.P. Green Industries, Inc. has adequately demonstrated compliance with this rule.

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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/opp>. 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 May 31, 2007 inspection. If you have any questions regarding waste management or pollution prevention activities, please call me at the above number.

Sincerely,



John Rochotte  
District Representative  
Division of Hazardous Waste Management

JR/mlm

**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.

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

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

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: OHD004282760

3. Site Name Name: A. P. Green Industries, Inc. Website (optional):

4. Site Location Information  
 Street Address: 1627 Pyro Road  
 City, Town, or Village: Oak Hill State: OH  
 County Name: JACKSON Zip Code: 45656

5. Site Land Type (check only one)  

Private	County	District	Federal	Indian	Municipal	State	Other
<input checked="" type="checkbox"/>							

6. NAICS code(s) [www.census.gov/epcd/www/naics.html](http://www.census.gov/epcd/www/naics.html)  
 A. 327125 B.  
 C. D.

7. Facility Representative:  
 First Name: John MI: Last Name: Crooks  
 Phone Number: 740-682-7711 Phone Number Extension:  
 E-Mail Address: john.crooks@apgref.com  
 Fax Number: Fax Number Extension:  
 Street or P.O. Box: 1627 Pyro Road  
 City, Town or Village: Oak Hill  
 State: OH Country: USA Zip Code: 45656

Additional names can be recorded in number 12.  
 Only provide address information if it is different than the site address.

8. 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.

A. Name of Site's Legal Owner: ANH Refractories Date Became Owner (mm/dd/yyyy): ?  

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							

 Street or P.O. Box: 400 Fairway Drive  
 City, Town, or Village: Moon Twp. Owner Phone #: 412-375-6600  
 State: PA Country: USA Zip Code: 15108

B. Name of Site's Operator: A. P. Green Industries, Inc. Date Became Operator (mm/dd/yyyy): ?  

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							

 Street or P.O. Box: 1627 Pyro Road  
 City, Town, or Village: Oak Hill Operator Phone #: 740-682-7711  
 State: OH Country: USA Zip Code: 45656

9. Violations Cited?  Yes  No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)  
 Not Regulated



### WASTE ACTIVITIES SUMMARY

Facility Name: A. P. Green Ind. Inc.

Facility Type: CESQG

EPA ID#: OHD004282760

Waste Generated				On-Site and Off-Site Management			Pollution Prevention Activities	
Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type and Location of Accumulation, Storage	Type of On-Site Treatment	Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
1	Auto/Truck/forklift Maintenance	Used Oil	NA	~50 gallons	Tank and containers	NA	Safety Kleen, Ashland, KY	
2	Maintenance	Spent parts washer solvent	D001, D018, D039, D040	< 10 gallons	NA	NA	Safety Kleen, Ashland, KY	
3	Auto/Truck/forklift Maintenance	Spent Batteries	D008	< 2	No specified location	NA	Recycled	
4	Lighting	Spent fluorescent lamps	D009	< 2	In storage bldg	NA	Recycled as a UW.	
5	Vehicle Maintenance	Spent antifreeze	NA	< 5 gallons	Container at facility	NA	Safety Kleen, Ashland, Ky	

**GENERAL FACILITY INFORMATION**

**Process Information:** A. P. Green, Industries, Inc produces refractory material at their Oak Hill plant. This material consists of bauxite, alumina and other clay materials. The "recipe" for a specific refractory is mixed and bagged or bulked from the plant.

**Regulatory/Enforcement History:** NA

**Pollution Prevention Remarks and/or Other Information:**

Would this facility be interested in a P2 assessment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<p style="text-align: center;"><b>REMARKS</b></p> <p>Small amount of waste generated. Facility will contact Ohio EPA as needed.</p>	

*If yes, refer to Ohio EPA Southeast District Office Pollution Prevention Coordinator or to Ohio EPA's Office of Compliance Assistance and Pollution Prevention, at 1-800-329-7518, [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html) .*

# 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

## GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]  Yes  No  NA

*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? [3734.02(F)]  Yes  No  NA

## 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