



State of Ohio Environmental Protection Agency

Southeast District Office

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

September 15, 2009

**MORGAN COUNTY
HANN MANUFACTURING, INC.
DHWM/SEDO
OHR000120519**

Mr. Cory Hann
Hann Manufacturing Inc.
PO Box 400
Malta, Ohio 43758

Dear Mr. Hann:

On September 9, 2009, Ohio EPA inspected Hann Manufacturing in McConnelsville to determine 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). During the inspection, I also helped Hann Manufacturing identify ways to prevent pollution by reducing waste. This letter will explain the violation I found, what you need to do to correct the violation, and other general concerns I identified during the 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 45 days** of your receipt of this letter:

- (1) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

Hann Manufacturing uses rags/wipers during the wood finishing process to apply wood stains and to clean up excess varnish, etc. After using the rags/wipers, Hann Manufacturing disposes of them in the trash. Hann Manufacturing has not evaluated the rags/wipers to determine if they are a hazardous waste, in violation of this rule.

Hann Manufacturing must evaluate the rags/wipers in accordance with this regulation and submit the results of the evaluation to this office for review. As I indicated in an e-mail to you on 9/14/09, the waste evaluation can be performed by one of two methods:

- 1) Have a sample of a spent rag/wiper sent to a laboratory for analysis. The analysis you would need to perform at the lab would be for flash point (ignitability) and TCLP volatiles; or
- 2) Review appropriate product information (MSDS sheets, etc.) to determine if the rags/wipers are hazardous. The MSDS sheets should have information regarding proper disposal methods that you would want to review to determine if the rags/wipers are hazardous.

GENERAL COMMENTS

- (a) During the review of Hann Manufacturing's paperwork, manifest no. 001997232 did not have a signature of the receiving facility (EEI in Cincinnati, OH). As we discussed, you should contact EEI to get a completed copy of this manifest for your records.
- (b) During the inspection, we discussed the issue of mercury-containing spent fluorescent bulbs, which your company generates. All fluorescent bulbs contain mercury and can potentially exhibit the characteristic of toxicity for mercury or other metals when disposed, rendering them a hazardous waste. You indicated that Hann Manufacturing places spent bulbs in a box, but has not collected a sufficient quantity of bulbs to recycle yet.

For your information, I have enclosed a fact sheet regarding fluorescent bulbs, including a recycler's list.

- (c) You indicated that small quantities of used oil may be generated when maintenance is performed on the forklifts (oil changes, etc.). As we discussed, used oil should be placed in a container that is in good condition, and the container labeled with the words "used oil." The used oil should then be recycled. For your information, I have included a used oil fact sheet which outlines the used oil rules.

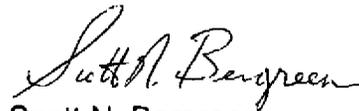
As we discussed during the inspection, your company may be able to reduce the waste your company generates. If you find ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates, you may be able to reduce treatment and disposal costs, and you may possibly reduce 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

Mr. Cory Hann
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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_recycle.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.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to contact me at (740) 380-5288. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Scott N. Bergreen
Environmental Specialist
Division of Hazardous Waste Management

SNB/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.

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 or mail it to Tammy
 McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHR000120519								
3. Site Name	Name: Hann Manufacturing, Inc.				Website: www.hannmfg.com (Optional)				
4. Site Location Information	Street Address: 4678 State Route 60 N						State: OH		
	City, Town, or Village: McConnelsville				County Name: Morgan				
	Zip Code: 43756								
5. 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"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Cory		MI:	Last Name: Hann					
	Phone Number: (740) 962-4885				Phone Number Extension:				
	E-Mail Address: cory.hann@hannmfg.com								
	Fax Number: (740) 962-4877				Fax Number Extension:				
	Street or P.O. Box: P.O. Box 400								
	City, Town or Village: Malta			State: OH		Country: USA		Zip Code: 43758	
	Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						
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	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:				
Name of Site's Operator: Hann Manufacturing, 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: 4678 State Route 60 N									
City, Town or Village: McConnelsville				Operator Phone #: (740) 962-4885					
State: OH			Country: USA		Zip Code: 43756				
9. Violations Cited?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input 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)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. 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"/> 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		10C. Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<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"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
11. 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.			
D001			
12. 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	Other Comments:
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Scott Bergreen			9/9/2009 10:30 - 11:30 am
14. 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: Hann Manufacturing, Inc.	Facility Type: CESQG	Date of Inspection: 9/9/09	EPA ID #: OHR000120519
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Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Sawing, planing, ripping lumber	Sawdust Non-haz.	Varies Sawdust pile is located behind main building	N/A	Sawdust is sold/given to local farms for use as animal bedding		
2 Wood finishing (spray booth #1 & #2)	Paint booth filters Non-haz.	Several filter rolls generated during weekly change intervals	N/A	Filters disposed of as solid waste		
3 Spray gun cleaning & old varnish	Spent lacquer thinner/ varnish D001	Small amounts generated (2 55 g. drums in five years)	N/A	Environmental Enterprises Inc. Cincinnati, OH	Use the same varnish for top coat & sealer, so don't have to clean out lines with lacq. thinner	
4 Finish lines #1 & #2 cleanup	Spent solvent wipers	Amounts vary	N/A	Wipers disposed of as solid waste		

REMARKS-GENERAL INFORMATION

General Process Information:

Hann Manufacturing operates a wood furniture manufacturing facility at 4678 State Route 60 North in McConnelsville. The types of furniture manufactured includes school furniture (science classrooms), arts & crafts furniture, drawing and drafting tables, storage units, workbenches, and stools. Kiln dried oak and maple lumber which is trucked in is planed, ripped, machined, assembled and hand coated in one of two spray booths. Hann Manufacturing uses a catalyzed conversion varnish coating as a top coat and sealer for the wood. Because they use the same varnish for the top and sealer coats, the spray lines do not have to be flushed with lacquer thinner for cleaning purposes. This reduces the amount of thinner waste generated. Lacquer thinner is used mainly as a cleaner to soak spray guns overnight. Since the last inspection in 2004, Hann Manufacturing generated two 55-gallon drums of lacquer thinner/varnish waste, which was manifested off-site on May 5, 2009. After the furniture is assembled, it is prepared for shipping and then sent to the customer by truck.

Regulatory/Enforcement History:

The last compliance evaluation inspection was conducted at Hann Manufacturing on January 22, 2004. The company returned to compliance with all violations resulting from this inspection on March 19, 2004.

Additional P2 remarks and information:

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

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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"). If so, complete the Small Quantity Generator Requirements checklist.

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

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

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

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>