



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 Korteski, Director

March 20, 2008

**MUSKINGUM COUNTY  
LONGABERGER BASKET  
DHWM/SEDO  
OHD987038437**

Mr. Greg Martin  
Longaberger Basket  
5565 Raiders Road  
Frazeyburg, Ohio 43822

Dear Mr. Martin:

On March 10, 2008, Jim Sferra and I inspected Longaberger Basket 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). This letter will explain the violations discovered during the inspection and what you need to do to correct them, the general concerns we have and what you can do to respond to those concerns, and any pollution prevention opportunities we identified.

We found the following violation of Ohio's hazardous waste laws:

- (1) ***OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators.*** Containers and above ground tanks used to store used oil at generator facilities must be labeled or clearly marked with the words "Used Oil."

At the time of the inspection, several containers in the Fleet Maintenance building that held used oil were not labeled "Used Oil." These containers included used oil cans with funnels, an old parts washer that was being used to drain spent oil filters, a used oil filter and drain pan over the used oil tank, and a secondary containment receptacle used for draining spent oil filters. On March 14, 2008, Longaberger Basket submitted photographic documentation to this office demonstrating that the containers of used oil in the Fleet Maintenance building had been properly labeled in accordance with this rule.

***Longaberger Basket has demonstrated a return to compliance with this rule.***  
No further action is necessary on your part to address this matter.

**GENERAL COMMENTS:**

- (a) Longaberger Basket indicated that the floor trenches in the Fleet Maintenance building are concrete-lined and lead to a concrete-lined pit with no outlet. Sludge (dirt, oil, and grease) is periodically removed from the trenches and pit. As we discussed, when the trenches and pit are cleaned out, Longaberger Basket must evaluate the sludge to determine if it is a hazardous waste prior to disposing of it.
- (b) While no free liquids were noted, the area around the used oil tank in the Fleet Maintenance building showed evidence of spills. Ohio EPA recommends that precautions be taken in transferring used oil from the containers to the tank to prevent spills of used oil, and that a spill kit be kept nearby to be used in the event that a spill occurs.
- (c) During the inspection, you indicated that Longaberger's Malta facility had closed. Unused products and wastes from the Malta facility were taken to Longaberger's Frazeyburg facility, where they were either used or re-containerized and shipped off-site for disposal. There are no restrictions on the movement of product materials or nonhazardous wastes from one Longaberger facility to another. However, please be advised that Longaberger Basket cannot transport hazardous waste from one Longaberger facility to another without being a registered transporter of hazardous waste and complying with the transporter requirements of OAC Rule 3745-53-10 through 31. In addition, Longaberger Basket cannot accept and/or store hazardous waste from another Longaberger facility without having a hazardous waste facility installation and operation permit, as this is prohibited under ORC §3734.02 (E).

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. 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 possibly reduce your regulatory requirements. You can find more pollution prevention information as well as compliance assistance information at <http://www.epa.state.oh.us/ocapp/ocapp.html>

Enclosed you will find a copy of the checklists that were completed during the inspection. I have also enclosed several fact sheets which you may find useful. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>

Longaberger Basket  
March 20, 2008  
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If you should have any questions, please feel free to call me at (740) 380-5237.

Sincerely,



Vicky D. German  
Environmental Specialist  
Division of Hazardous Waste Management

VDG/dh

Enclosure

**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: OHD987038437							
Site Name	Name: Longaberger Basket					Website: (Optional)		
Site Location Information	Street Address: 5565 Raiders Road							
	City, Town, or Village: Frazeytsburg					State: OH		
	County Name: Muskingum					Zip Code: 43822		
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>								
Facility Representative  Additional names can be recorded in "Comments" below  Only provide address information if it is different than the site address	First Name: Greg		MI:		Last Name: Martin			
	Phone Number: 740-828-4000				Phone Number Extension: 6321			
	E-Mail Address: gregmartin@longaberger.com							
	Fax Number:				Fax Number Extension:			
	Street or P.O. Box: same as above							
	City, Town or Village:							
	State: OH				Country: USA		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: The Longaberger Company				Date Became Owner (mm/dd/yyyy):			
	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: One Market Square, 1500 East Main Street							
	City, Town or Village: Newark				Owner Phone #: 740-828-4372			
	State: OH				Country: USA		Zip Code: 43055-8847	
	Name of Site's Operator: The Longaberger Company				Date Became Operator (mm/dd/yyyy):			
	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: same as above							
	City, Town or Village:				Operator Phone #:			
	State:				Country: USA		Zip Code:	
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
<b>Type of Generator:</b>								
<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)								
<b>Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)</b>								
<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					
<i>(Indicate types of universal waste generated and/or accumulated (check all boxes that apply))</i>					
<input type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste <i>(accumulates 5,000 kg. or more)</i>		
<input type="checkbox"/> Destination Facility for Universal Waste					
<i>(Check all boxes below that apply for each of the three types of facilities above)</i>			Used Oil Activities <i>(Indicate Type(s) of Activity(ies))</i>		
	Generated	Accumulated	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner	
Batteries	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner		
<b>Waste Codes for Federally Regulated Hazardous Wastes.</b> <i>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.</i>					
D001					
<b>Comments:</b> <i>Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</i>					
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:		MaryAnn Figgins, Environmental Affairs Coordinator
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments		
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Vicky German, DHWM-SEDO		Jim Sferra, DHWM-SEDO		03/10/2008	
<b>OPTIONAL CERTIFICATION.</b> <i>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.</i>					
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)	

# 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

*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.*

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

*The company does not conduct treatment in containers, tanks, drip pads, or containment buildings.*

## USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

**NOTE:** A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

### PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? Yes  No  N/A   
If yes:
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes  No  N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes  No  N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes  No  N/A

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

### GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes  No  N/A   
a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes  No  N/A

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes  No  N/A

**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks, or containers, or a unit subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes  No  N/A

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes  No  N/A

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes  No  N/A

At the time of the 3/10/08 inspection, several containers in the Fleet Maintenance building that held used oil were not labeled "Used Oil". These containers included used oil cans with funnels, an old parts washer that was being used to drain spent oil filters, a used oil filter drain pan over the used oil tank, and a secondary containment receptacle used for draining spent oil filters. Longaberger Basket sent photographic documentation to this office on 3/14/08 demonstrating that these containers have been labeled "Used Oil" in accordance with this rule.

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes  No  N/A

b. Contained the release? Yes  No  N/A

c. Cleaned up and properly managed the used oil and other materials? Yes  No  N/A

While no free liquids were noted, the area around the used oil tank in the Fleet Maintenance building showed evidence of spills. Ohio EPA recommends that precautions be taken in transferring used oil from the containers to the tank to prevent spills of used oil and that a spill kit be kept nearby to be used in the event that a spill occurs.

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A

### ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes  No  N/A

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes  No  N/A

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes  No  N/A

c. Are the combustion gases from heater vented to the ambient air? Yes  No  N/A

### GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator:

a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] Yes  No  N/A

b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes  No  N/A

**NOTE:** Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

### COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes  No  N/A

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes  No  N/A

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes  No  N/A

**NOTE:** Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more  
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

## PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes  No  NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes  No  NA

## WASTE MANAGEMENT - LABELING/MARKING

### UNIVERSAL WASTE LAMPS

8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes  No  NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? [3745-273-13(D)(2)] Yes  No  NA
- a. Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes  No  NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes  No  NA

*No lamps were accumulated on-site at the time of the inspection.*

**NOTE:** Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

## ACCUMULATION TIME

**NOTE:** Accumulation is defined as date generated or date received from another handler.

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes  No  NA
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes  No  NA

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]

- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes  No  NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes  No  NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes  No  NA
- d. 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 became a universal waste or was received? [3745-273-15(C)(4)] Yes  No  NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes  No  NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes  No  NA

*No lamps were accumulated on-site at the time of the inspection.*

#### EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes  No  NA

#### RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes  No  NA
15. Is the material released characterized? [3745-273-17(B)] Yes  No  NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes  No  NA

## OFF-SITE SHIPMENTS

**NOTE:** If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes  No  NA
18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes  No  NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes  No  NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes  No  NA
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes  No  NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes  No  NA
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes  No  NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes  No  NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes  No  NA

## EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes  No  NA
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes  No  NA
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)] Yes  No  NA
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes  No  NA

## WASTE ACTIVITIES SUMMARY

Facility Name: Longaberger Basket

Facility Type: CESQG

EPA ID#: OHD987038437

Waste Generated				On-Site Management		Off-Site Management	
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	
1	Basket Operation Regular and accent staining on baskets with water-based stains and sealers	Non-hazardous sludges and rinse waters	NA	Varies	Totes in Building "B" (Main manufacturing building)	NA	Suburban Landfill, Perry County Solidified and landfilled
2	Basket Operation Woodcraft building water-based stains and sealers	Non-hazardous wash water/sludges	NA	Varies	Totes in Building "E" (Woodcraft building)	NA	Suburban Landfill, Perry County Solidified and landfilled
3	Basket Operation Woodcraft building	Non-hazardous glue wastes (Multibond 2020)	NA	~ 4 55-G drums/yr.	Drums in Building "E" (Woodcraft building)	NA	Suburban Landfill, Perry County Landfilled
4	Basket Operation Scraps from handles, dividers, lids, and scrap weaving strips	Wood scraps and sawdust	NA	Varies	Hoppers in Buildings "D" (Chipper building) and Building "E" (Woodcraft building).	NA	Stone Container Used as boiler fuel
5	Fleet Maintenance and CFC Building Parts cleaning	Spent parts cleaner	NA Reuse program	15 G/mo	Fleet Maintenance and CFC Building	NA	Crystal Clean, Indianapolis IN Recycled – Reuse program

### WASTE ACTIVITIES SUMMARY

Facility Name: Longaberger Basket

Facility Type: CESQG

EPA ID#: OHD987038437

Waste Generated				On-Site Management		Off-Site Management
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
6 Fleet Maintenance - Oil changes Woodcraft Building -Hydraulic oils and machine oils from equipment.	Used oil	NA	~ 55 G/mo	Used oil tank in Fleet Maintenance building	NA	Crystal Clean, Indianapolis IN Recycled
7 Fleet Maintenance - Oil changes	Used oil filters	NA	One 55-G drum every 4 to 5 mo.	Fleet Maintenance building	Drained, containerized	Crystal Clean, Indianapolis IN Recycled
8 Fleet Maintenance Antifreeze changes	Spent antifreeze	NA	Varies ~ 10 G/mo	Spent antifreeze tank in Fleet Maintenance building	NA	AmeriWaste, Independence, OH Recycled
9 Fleet Maintenance Battery changes	Spent lead-acid batteries	NA - Recycled	Varies	Fleet Maintenance building	NA	NAPA, Zanesville, OH core exchange program
10 Fleet Maintenance	Spent brake fluids and cleaners	D018 D022 D019 D028 D039 D040 D029	Only generated occasionally- None at time of inspection	Fleet Maintenance building	NA	AmeriWaste, Independence, OH Disposal

## WASTE ACTIVITIES SUMMARY

Facility Name: Longaberger Basket

Facility Type: CESQG

EPA ID#: OHD987038437

Waste Generated				On-Site Management		Off-Site Management
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
11 Building maintenance	Spent fluorescent lamps	NA	Varies	Disposed as generated during lighting changes	NA	American Light, Zanesville Recycled by Veolia
12 Paint Shop (now closed except for occasional small projects)	Spent latex and water-based paint related wastes	NA	Only generated occasionally	1-G and 5-G containers in Paint Shop	NA	Suburban Landfill, Perry County Solidified, then landfilled
13 Paint Shop (now closed except for occasional small projects)	Spent solvent-based paint related wastes and thinners	Unknown-None at time of inspection	Only generated occasionally	55-G drums in Paint Shop	NA	AmeriWaste, Independence, OH Disposal

**Facility Map Attached**

## GENERAL FACILITY INFORMATION

### **Process Information and Wastes Generated:**

Longaberger Basket, owned by The Longaberger Company, makes hand-woven wooden baskets of all sizes. Wood for the baskets (mostly maple) arrives at this facility pre-cut into strips from Longaberger's Hartville facility. Weaving stations are grouped together by the size of the basket being made, so that each station has the correct pre-sized materials to work with. The body of the basket is woven around a form to ensure each is the same size and shape. After weaving, the baskets are pre-dried, stained, then post-dried. Lids, dividers, and handles for the baskets are also made on-site; they are cut out of wood panels, finished, and attached to the woven baskets to make the finished product. Water-based stains are used on all baskets to give them their characteristic light brown color, and some baskets have accent colors which are also water-based stains. It takes approximately 3 days from start to finish to create one basket; this varies depending on the basket size. Wastes generated from the basket making operation include spent latex and water-based stains, non-hazardous sludges and rinse waters, and wood scraps.

Longaberger previously had a Fleet Division, a Construction Division, and a Paint Shop on-site. One U.S.EPA ID number was used to manifest wastes off-site since these facilities were all on one contiguous property. Of these, only the Fleet Division/Fleet Maintenance continues to operate; the Construction Division and the Paint Shop have closed. Fleet Maintenance generates used oil and antifreeze and spent parts cleaner. Occasionally, brake fluids/cleaners are also generated. The Paint Shop is used occasionally for small projects, at which time spent paint-related wastes are generated. Maintenance of Longaberger's buildings generates spent fluorescent lamps.

### **Regulatory/Enforcement History:**

Longaberger Basket notified EPA of their hazardous waste generation activities as a Small Quantity Generator (SQG) of hazardous waste on 5/7/1993. The company was last inspected on 11/24/2003 and returned to compliance with all violations discovered during the inspection on 1/21/2004. Currently the company is operating as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

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

Would this facility be interested in a P2 assessment?

Yes  No  NA

The company uses spent latex and water-based stains and nonhazardous glues in the basket operation. In addition, Longaberger's on-site Construction Division and Paint Shop have closed, resulting in the elimination of several hazardous waste streams.

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).

# Longaberger Basket Site Map

