



State of Ohio Environmental Protection Agency

Southeast District Office

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

October 24, 2007

**PIKE COUNTY
GENERAL FILE
(OHIO STATE UNIVERSITY SOUTH
CENTERS - PIKETON EXTENSION)
DHWM/SEDO
OH0000473215**

Mr. Jeff Roberts
Ohio State University South Centers - Piketon Extension
1864 Shyville Road
Piketon, Ohio 45661

Dear Mr. Roberts:

On October 17, 2007, Melody Stewart and I inspected the Ohio State University (OSU) South Centers - Piketon Extension facility 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 any violations found as a result of the inspection and what you need to do to correct the violations, as well as any general concerns we have and how you can address those concerns.

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

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

During the inspection, we observed one 55-gallon drum which contained used oil, located in an outdoor storage building that was not labeled with the words "Used Oil".

On October 22, 2007, OSU South Centers - Piketon Extension sent photographic documentation that the 55-gallon drum has been properly labeled with the words "Used Oil". Therefore, OSU South Centers - Piketon Extension has returned to compliance with this rule. No further action on your part is necessary regarding this violation.

GENERAL COMMENTS

- (a) Currently, the facility is managing spent batteries and spent fluorescent lamps as hazardous waste. As we discussed during the inspection, you have the option of managing these items as universal waste. The universal waste rules were designed to promote recycling and proper disposal by easing certain regulatory requirements, such as manifesting, that are associated with hazardous waste requirements. To manage these items as universal waste, they must be kept in containers that are in good condition, and kept closed. Each container must be appropriately labeled (for example, with the words "Universal Waste Lamps"; "Universal Waste Batteries"). You may store universal waste on-site for up to one year from the time it was generated, so you must be able to demonstrate the accumulation time for all universal wastes. This can be done by labeling the container with the earliest date that any universal waste in the container was generated, by labeling each individual item (each battery or lamp) with the date it became a waste, or by any other method which demonstrates the length of time that the universal waste has been accumulated from the date it became a waste. I have enclosed some information and fact sheets regarding universal waste management for your reference.
- (b) During the inspection, we discussed that OSU South Centers - Piketon Extension has an on-site wastewater treatment system, but will soon be tying in to the City of Piketon's system. As we discussed, any sludge generated from the clean out of your on-site system must be evaluated to determine if it is a hazardous waste prior to its disposal. I have enclosed a list of analytical laboratories, and a list of commercial facilities in Ohio that accept hazardous waste (many of these facilities also do analytical testing, and will accept the sludge as an industrial solid waste if it is non-hazardous).
- (c) As I mentioned during the inspection, Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is an independent, non-regulatory office within Ohio EPA that provides information and resources to help facilities identify and implement pollution prevention measures that can save money and benefit the environment. This office provides a free on-site assessment of a facility's operations to identify and evaluate opportunities to reduce wastes and pollution. If your facility would like to be considered for an on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, you can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at their toll free phone number, (800) 329-7518, or by e-mail at p2mail@epa.state.oh.us. You can also find more information about on-site pollution prevention assessments at: <http://www.epa.state.oh.us/ocapp/p2/p2assmnt.html>.

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Enclosed you will find a copy of the checklists that were completed during the inspection. You can find copies of the rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>. Compliance assistance and pollution prevention information and fact sheets are available at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions, please feel free to call me at (740) 380-5237.

Sincerely,



Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

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 or mail it to
Tammy McConnell, Central Office

Site EPA ID No.	EPA ID Number: OH0000473215							
Site Name	Name: Ohio State University South Centers - Piketon Extension					Website: (Optional)		
Site Location Information	Street Address: 1864 Shyville Road							
	City, Town, or Village: Piketon				State: OH			
	County Name: Pike				Zip Code: 45661			
Site Land Type (check only one)	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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
NAICS code(s) www.census.gov/epcd/www/naics.html								
Facility Representative Additional names can be recorded in "Comments" below Only provide address information if it is different than the site address	First Name: Jeff		MI:		Last Name: Roberts			
	Phone Number: 740-289-2071			Phone Number Extension: 149				
	E-Mail Address: Roberts.197@ous.edu							
	Fax Number: 740-289-4591			Fax Number Extension:				
	Street or P.O. Box:							
	City, Town or Village:							
	State: OH			Country: USA		Zip Code: 45690		
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):			
	State of Ohio							
	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 checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 1314 Kinnear Road							
	City, Town or Village: Columbus				Owner Phone #:			
	State: Ohio				Country: USA		Zip Code: 43212	
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):			
	Ohio State University South Centers - Piketon Extension							
	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 checked="" 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							
Type of Generator:								
<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)								
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 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 checked="" 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		
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.					
D001	D002	D007	D008	D009	D035
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			
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		10/17/2007	
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)	

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.

USED OIL GENERATOR REQUIREMENTS

NOTE: (Short Version) - This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes No NA
 Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes No NA
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No NA
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes No NA

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes No NA
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 NA
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No NA
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No NA
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 NA
One 55-gallon drum located in an outdoor storage building, was not labeled with the words "used oil". On 10/22/07, the facility sent photographic documentation that the drum has been properly labeled.
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 NA
- b. Contained the release? Yes No NA
- c. Cleaned up and properly managed the used oil and other materials? Yes No NA
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No NA
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:
- 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 NA
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No NA
- c. Are the combustion gases from heater vented to the ambient air? Yes No NA

11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No NA

USED OIL 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 NA
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No NA
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 NA

WASTE ACTIVITIES SUMMARY

Facility Name:

Facility Type:

EPA ID#:

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	Laboratory	Acid waste (sulfuric acid)	D002	~ 1 G/mo	5-G container in laboratory	NA	Clean Harbors	NA	NA
2	Laboratory	Acids, bases and potassium dichromate (reagents, etc.)	D001 D007	~ 2 G/mo	5-G container in laboratory	NA	Clean Harbors	NA	NA
3	Grounds maintenance	Used oil	NA	~8 G/mo	55-G drum in storage building	NA	Teris LLC	NA	NA
4	Grounds maintenance	Lead-acid batteries	D002 D008	Varies	in maintenance building	NA	Clean Harbors	Currently managed and disposed as hazardous waste	Could be managed as universal waste - recycled
5	Grounds maintenance	Paint-related waste	D001 D008 D009 D035	Varies (infrequent)	in maintenance building (none on site during inspection)	NA	Clean Harbors	NA	NA
6	Building maintenance	Spent fluorescent lamps	D009	Varies	in maintenance building	NA	Clean Harbors	Currently managed and disposed as hazardous waste	Could be managed as universal waste - recycled

GENERAL FACILITY INFORMATION

Ohio State University (OSU) South Centers - Piketon Extension is part of the OSU College of Agriculture's cooperative extension service. The educational function of land-grant universities such as OSU is supplemented by the establishment of research farms like the OSU Piketon Extension, where land-grant universities can conduct research on agricultural related problems of interest to local farmers and rural citizens. OSU South Centers - Piketon Extension focuses on Aquaculture, Horticulture and Soil and Water Quality, Watershed Management, and Forestry, as well as economic development related to these areas.

Aquaculture

The facility has a wet lab that contains numerous tanks used for rearing fish to maturity. The tanks are supplied with water that can be temperature-controlled and recirculated for different growth experiments. In addition, the facility has a greenhouse which contains tanks that can be used for holding fish at different experimental stages in growth experiments, and several ponds. Research primarily focuses on improvement of broodstock and production techniques through long-term selective breeding programs and genetic improvement. Results can be applied toward increasing the productivity and profitability of aquaculture operations in Ohio. The Aquaculture Genetics Laboratory performs sample preparation and genetic analysis through tissue cultures, and DNA sequencing/genotyping analyses.

Soil and Water Quality / Horticulture

The facility conducts research on potentially profitable crops and crop management systems that are suitable for the local growing conditions of southern Ohio. Research is aimed at promoting agricultural practices and management systems that are productive and profitable while preserving soil and water quality. Such research includes production trials with fruits and vegetables such as testing effects of increased pH on growth, effects of different tillage and crop rotation techniques, effects of different mulches and composts on crop growth and yield. Recent production trials were done with raspberry and blueberry cultivars. The facility identifies core soil quality indicators and develops soil quality tests that can be used in the laboratory or in the field. The Soil and Water Quality Laboratory conducts sample preparation and analysis of well water and soil core cuttings.

Information received during the inspection and from the facility's web site at: <http://southcenters.osu.edu/>

PROCESS INFORMATION

The Aquaculture Genetics Laboratory performs sample preparation and genetic analysis through tissue cultures, DNA sequencing/genotyping analyses. The Soil and Water Quality Laboratory conducts sample preparation and analysis of well water and soil core cuttings. Lab wastes (spent reagents and miscellaneous chemicals used in testing and analysis) are generated from these laboratories.

Wastes are also generated from building and grounds maintenance; including used oil, spent antifreeze, spent batteries, spent fluorescent lamps, and occasionally paint-related wastes from touch-ups on equipment.

REGULATORY HISTORY

OSU South Centers - Piketon Extension was last inspected for compliance with Ohio's hazardous waste laws on August 23, 1994. No violations were found during the inspection.