

August 24, 2007

ROSS COUNTY
GENERAL FILE
(RIFFLE MACHINE)
DHWM/SEDO
OHR000118166

Mr. Tim Riffle
Riffle Machine Works
4815 State Route 159
Chillicothe, Ohio 45601

Dear Mr. Riffle:

On August 22, 2007, Rich Stewart and I inspected two Riffle Machine Works ("RMW") facilities located in Chillicothe, Ohio (4815 State Route 159; and 90 and 94 Columet Drive) to determine RMW's 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). RMW was represented by Mr. Tim Riffle.

I found the following violations of Ohio's hazardous waste laws at both facilities. In order to correct these violations, you must do the following and send the required information **within 30 days** of the date of this letter:

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

RMW failed to evaluate spent fluorescent and other lamps used in their two locations. The spent lamps have been disposed of as a solid waste.

RMW must immediately evaluate these wastes to determine if they are a characteristic hazardous waste as required by this rule, and submit documentation of this evaluation to this office for review. Alternatively, RMW may choose to manage spent lamps as a universal waste by recycling them in accordance with OAC Chapter 3745-273. If you choose the latter, you will not need to evaluate your spent lamps. However, if you determine that you will manage your lamps as a universal waste, you must submit to this office a description of how you will manage the spent lamps in accordance with Ohio's universal waste regulations while they are accumulating onsite, and which recycling vendor you plan to use. Note that you must also train employees to properly manage universal waste lamps. In addition, please note that any broken lamps must be managed as a hazardous waste by manifesting them offsite.

During the inspection, we provided you with a fact sheet on management of spent lamps as a universal waste. The following link will provide a list of vendors who will recycle spent lamps in Ohio:

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>

GENERAL COMMENTS:

- (A) RMW is a conditionally exempt small quantity generator (CESQG) at its 4185 State Route 159 location because it generates small volumes of paint related waste from painting operations. The hazardous waste ID number for this location is OHR000118166. RMW's second and new location at 90 and 94 Columet Drive is a non generator of hazardous waste. The following link will provide a list of, and links to CESQG regulations that apply to your State Route 159 location.

<http://www.epa.state.oh.us/dhwm/pdf/GeneratorRequirementsTable.pdf>

- (B) If RMW chooses to recycle its spent lamps (as opposed to evaluating them to determine if they are a hazardous waste, and if so, manifesting them off-site), RMW would be a small quantity handler of universal waste at each of its two facilities (4185 State Route 159, and 90 and 94 Columet Drive). The following link will provide the universal waste regulations for management of spent lamps:

http://www.epa.state.oh.us/dhwm/l_ruwm.html

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5293. 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,

Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/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 or mail it to Tammy
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: non generator								
3. Site Name	Name: Riffle Machine Works				Website: (Optional)				
4. Site Location Information	Street Address: 5746 State Route 159						State: OH		
	City, Town, or Village: Chillicothe				Zip Code: 45601				
	County Name:								
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	unknown								
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: Bob			MI:	Last Name: Netherton				
	Phone Number: 740-775-3059				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:				State:		Country:		Zip Code:
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	Name of Site's Legal Owner: Tim Riffle				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:								
	City, Town or Village:				State:		Country:		Zip Code:
	Owner Phone #:								
	Name of Site's Operator: Riffle Machine Works				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:								
	City, Town or Village:				State:		Country:		Zip Code:
	Operator Phone #:								
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 checked="" type="checkbox"/> Not Regulated				<input 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 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		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 checked="" 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.			
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: Company is a non generator of hazardous waste.
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
13. Name of Inspector(s)		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Donna Goodman			4/21/2009
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: Riffle Machine Works
 Facility Type: LQG
 SQG
 CESQG
 TSD
Date of Inspection: 8/22/07
EPA ID#: OHR000118166

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Painting spent paint/thinner F003/ F005	14 5-gallon containers over 3 years		Has not yet been sent offsite.		
2	lighting spent lamps unevaluated	varies		disposed of as a solid waste to RLS recycling.		
3						
4						
5						
6						
7						

8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

Riffle Machine Works operates a machine shop at 4185 State Route 159 that does a variety of machine work for other businesses. In the past, this location was an LQG due to a 660 gallon tank of paint stripper from which they generated large quantities F002/F003 every few months. Approximately 3 years ago they ceased this operation and manifested the tank contents offsite. Currently they are a CESQG due to the generation of small quantities of paint related wastes generated from painting of parts for Kenworth Trucking Company. Riffle Machine has a second and newer location (opened approximately three years ago) at 90 and 94 Columet Drive, Chillicothe. At this location in two buildings, the company assembles parts into kits for Kenworth. The company is not generatiing hazardous waste at this location, however, they do generate spent lamps which they have failed to evaluate.

Regulatory/Enforcement History (if applicable):

Company was last inspected on 1/07/04 and RTC'ed on 10/27/04 at 4185 State Route 159.

Additional P2 remarks and information:

The company had a P2 Assessment in 2004 at 4184 State Route 159.

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: