



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 Korleski, Director

January 29, 2008

**SCIOTO COUNTY  
GENERAL FILE  
(WNA TRUCKING)  
DHWM/SEDO  
NON NOTIFIER**

Ms. Laurie Conley and Mr. Robert Ramey, Owners  
WNA Trucking Company  
146 Richendollar Road  
Ironton, Ohio 45638

Dear Ms. Conley and Mr. Ramey:

On January 24, 2008, Ohio EPA conducted a complaint investigation of WNA Trucking Company in response to a complaint received by this office. The complainant alleged that your company was disposing of used oil and antifreeze on the ground, and that a diesel fuel storage tank was leaking. You were not present during the investigation; however, your employee, John Clark, accompanied me.

Based on my investigation, I did not observe mismanagement of spent antifreeze, which is sent offsite for recycling, according to Mr. Clark. However, I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 30 days** of the date of this letter:

(1) **OAC Rule 3745-279-22(B),(C)&(D), Used Oil Storage Requirements for Generators:** (B) Containers of used oil must be in good condition, not leaking, and (C) labeled with the words "Used Oil"; (D) Upon detection of a release of used oil to the environment, a used oil generator must stop the release, contain the released used oil, clean up and properly manage the released used oil and materials used to clean up the used oil, and if necessary, repair or replace any leaking used oil storage containers prior to returning them to service for used oil storage.

(B) Several drums of used oil behind your shop were leaking onto the ground. (C) Four drums of used oil inside your shop were not properly labeled. These were labeled during the inspection; therefore, this section of the violation has been abated. (D) Used oil was leaking onto the ground from several drums located behind the truck repair shop.

To correct (B) and (D) above, you must immediately stop oil from leaking onto the ground. Then you must clean up the ground where used oil was released. You must excavate the oily soil until the soil that remains is no longer visibly contaminated with used oil and appears clean. The oil-stained soil that has been excavated can be

Ms. Laurie Conley and Mr. Robert Ramey  
WNA Trucking Company  
January 29, 2008  
Page 2

managed as a solid waste, and disposed of by your regular solid waste/garbage disposal company. You may wish to contact your solid waste disposal company to determine if they have any additional requirements for the disposal of this waste. To demonstrate a return to compliance with this rule, you must send a photograph of all cleaned up areas to this office.

#### GENERAL COMMENTS

(A) During the investigation, we were told that diesel fuel had spilled onto the ground in the recent past from a diesel fuel storage tank hose that failed and had subsequently been repaired. We did not see any signs of active leaking and were unable to determine the extent of the past spill due to snow which covered the parking lot. WNA Trucking must immediately excavate all visibly contaminated gravel that was affected by this spill and manage it as a solid waste by disposing of it in your trash. Please submit a photograph of this area when it has been cleaned up.

(B) Several batteries were stored on the ground next to the shop. Batteries should be stored on an impermeable surface such as concrete or blacktop, and should be covered or under roof until such time as they are sent offsite for recycling. These management practices will prevent weathering and limit the possibility of deterioration which could result in batteries leaking onto the ground.

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/mlm

Enclosure

cc: Clint Shuff, DSIWM

**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  
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: non notifier	
3. Site Name	Name: WNA Trucking Company	Website: (Optional)
4. Site Location Information	Street Address: 146 Richendollar Road	
	City, Town, or Village: Ironton	State: OH
	County Name: Scioto	Zip Code: 45638
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) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	811111	
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: John	MI: Last Name: Clark
	Phone Number:	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:	
	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:	Owner Phone #:
	State:	Country: Zip Code:
	Name of Site's Operator: WNA Trucking Company	
	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:	Operator Phone #:	
State:	Country: Zip Code:	
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)		
<input 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 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))	
	<b>Managed</b>	<input checked="" 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.			
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b>
<b>Tanks</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Other Comments: Drums contained used oil.</b>
<b>Containers</b>	<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)
Donna Goodman		Scott Bergreen	1/24/2008
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)