



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

December 11, 2007

**WASHINGTON COUNTY  
GENERAL FILE  
(MONDO POLYMER  
TECHNOLOGIES)  
DHWM/SEDO  
NON-NOTIFIER**

Ms. Maggie Ellis  
General Manager  
Mondo Polymer Technologies  
State Route 7  
P.O. Box 250  
Reno, Ohio 45773

Dear Ms. Ellis:

On December 6, 2007, Ohio EPA conducted a compliance evaluation inspection at your facility located on State Route 7 in Reno to determine compliance with Ohio's hazardous waste laws and regulations as found in the Ohio Revised Code (ORC) and the Ohio Administrative Code (OAC). During the inspection, we also helped Mondo Polymer Technologies 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, other general concerns I have, and what you need to do to respond to the general concerns.

We 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 30 days** of your receipt of this letter:

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

During the inspection, it was observed that a tank and several 55-gallon drums of used oil were not labeled "used oil", in violation of this rule. To abate this violation, Mondo Polymer Technologies must label the tank and drums and send me documentation in the form of photographs, documenting your compliance with this rule.

**GENERAL COMMENTS**

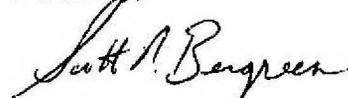
- (a) As we discussed during the inspection, Ohio EPA recommends that Mondo Polymer Technologies consider installing a used oil fired space heater to heat buildings at your business. For more information on Clean Burn used oil fired furnaces, see their web page at [www.cleanburn.com](http://www.cleanburn.com).

- (b) During our visit, we discussed with Mr. Hockenberry 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. Ohio EPA recommends that the bulbs be recycled instead of disposing of them as a hazardous waste. The bulbs should not be crushed; rather, spent bulbs should be placed in a box or other suitable container prior to recycling. Enclosed is a fact sheet concerning fluorescent bulbs, along with a listing of fluorescent bulb recyclers for your information.

As discussed during the inspection, you 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 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](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](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: Non-Notifier									
3. Site Name	Name: Mondo Polymer Technologies					Website: (Optional)				
4. Site Location Information	Street Address: State Route 7									
	City, Town, or Village: Reno					State: OH				
	County Name: Washington					Zip Code: 45773				
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>										
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: Mark			MI:	Last Name: Mondo					
	Phone Number: 740-376-9396				Phone Number Extension:					
	E-Mail Address:									
	Fax Number: 740-376-9960				Fax Number Extension:					
	Street or P.O. Box: State Route 7									
	City, Town or Village: Reno					State: OH			Country: USA	Zip Code: 45773
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: Mark Mondo				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: State Route 7									
	City, Town or Village: Reno				Owner Phone #: 740-376-9396					
	State: OH				Country: USA		Zip Code: 45773			
	Name of Site's Operator: Mondo Polymer Technologies				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: P.O. Box 250									
	City, Town or Village: Reno				Operator Phone #: 740-376-9396					
	State: OH				Country: USA		Zip Code: 45773			
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										

<b>10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))</b>		
<input type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>	<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)</b>	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>		
Check all boxes below that apply for each of the three types of facilities above		
<b>Managed</b>	<b>10C. Used Oil Activities (Indicate Type(s) of Activity(ies))</b>	
<b>Batteries</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b> <input type="checkbox"/> <b>Used Oil Transporter</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b> <input type="checkbox"/> <b>Used Oil Processor</b>
<b>Mercury containing equipment</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Re-refiner</b>
<b>Lamps</b>	<input checked="" type="checkbox"/>	
<b>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.</b>		
<b>12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</b>		
<b>Announced</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b> Ms. Maggie Ellis, Mr. Rick Hockenberry
<b>Tanks</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Other Comments:</b>
<b>Containers</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>13. Name of Inspector(s)</b>	<b>Name of Inspector(s)</b>	<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>
Scott Bergreen	Steve Williams	12/6/2007 10:30 am - 1:20 pm
<b>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.</b>		
<b>Signature of Owner, Operator, or an Authorized Representative</b>	<b>Name and Title (Print)</b>	<b>Date (mm/dd/yyyy)</b>

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*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? If yes: Yes  No  N/A
- 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(s) 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
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
- 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: [3745-279-24] Yes  No  N/A
- 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.*

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

**PROCESS, WASTE, P2 SUMMARY SHEET**

<b>Facility Name:</b> Mondo Polymer Technologies	<b>Facility Type:</b> Non-Generator	<b>Date of Inspection:</b> 12/6/07	<b>EPA ID #:</b> Non-Notifier
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<b>Waste Generated</b>			<b>On- or Off-Site Management</b>		<b>P2 Activities</b>	
<b>Process/Activity Generating Waste</b> (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	<b>Waste Description</b> (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	<b>QTY. Generated per Month, Type of Accumulation</b> (container, tank, etc) and location of waste accumulation area	<b>Type of On-Site Treatment</b> (recycle, wwt, etc)	<b>Name, state, and type of activity occurring at the off-site facility.</b>	<b>Current P2 Activities</b>	<b>P2 Opportunities</b>
1 Maintenance	Used Oil	Amount Varies  Used oil stored in aboveground tank and 55 g. drums behind Maintenance shop	N/A	Heartland Petroleum 4560 W. Pike St. Zanesville, OH		Installing used oil space heater
2 Parts Cleaning	Spent stoddard solvent (Varsol)	Amount varies  Facility mixes spent solvent with used oil	N/A	Heartland Petroleum 4560 W. Pike St. Zanesville, OH		

## REMARKS-GENERAL INFORMATION

### **General Process Information:**

Mondo Polymer Technologies, located on State Route 7 in Reno, is a plastic recycler and manufacturer. The business is located at the former Matlack Trucking terminal. The facility takes in scrap polyethylene and other types of plastics and processes it to make plastic spacer blocks for guardrails (the block between the guardrail post and the guardrail). A second business is located at the same location, Mark Mondo Building & Excavating, Inc, which is an excavation contractor that installs tanks. Oil changes are performed on trucks, forklifts, gearboxes, and hydraulic systems; the used oil is stored in an aboveground tank and 55 gallon drums inside a secondary containment dike behind the maintenance shop. Spent parts washer solvent (stoddard solvent) is added to used oil and the mixture is picked up by Heartland Petroleum of Zanesville.

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

No previous compliance evaluation inspections have been conducted at Mondo Polymer Technologies.

### **Additional P2 remarks and information:**

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