



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Gorman-Rupp Industries
OHD004154183
Conditionally Exempt Small
Quantity Generator/
Used Oil Generator/
Richland County, NWDO
NOV

September 14, 2010

Mr. Paul Bisel, Material Flow Manager/ Safety Coordinator
Gorman-Rupp Industries
180 Hines Avenue
Bellville, Ohio 44813

Dear Mr. Bisel:

On August 24, 2010, I conducted a compliance evaluation inspection of Gorman-Rupp Industries facility located at 180 Hines Avenue, Bellville, Ohio. I inspected Gorman-Rupp Industries to determine the facility'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). My inspection included a tour of the facility as well as a review of facility records. I also helped Gorman-Rupp Industries identify ways to prevent pollution by reducing waste the facility generates. John Smith, Maintenance Manager and you accompanied me during the inspection.

Gorman-Rupp Industries is primarily doing business as a manufacturer of OEM fluid flow pumps for multiple applications. Facility records reviewed during this inspection indicate that Gorman-Rupp Industries generates approximately five gallons of (D001/ D018/ D039/ D040) hazardous waste spent solvent on a quarterly basis, fifty-five gallons of water based solvent on an annual basis, spent lead acid batteries from tow motors, scrap plastic and spent fluorescent lamps.

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 your receipt of this letter:

1. **OAC Rule 3745-52-11, Hazardous Waste Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

- a. Gorman-Rupp Industries has failed to evaluate the oily sludge discharged from the aqueous parts cleaning unit. The oily sludge is currently managed and shipped off-site as used oil.

To abate this violation, Gorman-Rupp Industries must have a representative sample of the aqueous parts cleaning oily sludge analyzed for total volatile organic compounds (VOC's) and Total Resource Conservation and Recovery Act (RCRA) metals using methods as outlined in U.S. EPA's SW-846.

- b. Gorman-Rupp Industries has failed to evaluate the spent fluorescent lamps used throughout the facility to determine if they are hazardous waste. Gorman-Rupp Industries currently manages the spent lamps as solid waste and disposes of the spent lamps in a solid waste dumpster.

Gorman-Rupp Industries must immediately cease disposing of the spent lamps as non-hazardous waste until a proper waste evaluation has been completed. The spent lamps typically contain mercury and other heavy metals which could make them a hazardous waste.

Gorman-Rupp Industries has the option of handling spent lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent fluorescent lamps.

To abate this violation, Gorman-Rupp Industries must choose one of the following options for the spent lamps:

- i. **Disposal Option:**

Gorman-Rupp Industries may manage the lamps as a hazardous waste. Gorman-Rupp Industries must sample each type and brand of lamp used at the facility for RCRA metals using a Toxicity Characteristic Leaching Procedure (TCLP) test. Gorman-Rupp Industries must ensure that all spent lamps that are determined to be hazardous waste are disposed of at a

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permitted hazardous waste disposal facility. Gorman-Rupp Industries must submit all analytical results to Ohio EPA along with a description of how the spent lamps will be managed or,

ii. **Recycling Option:**

In lieu of evaluating and disposing of the spent lamps, Gorman-Rupp Industries may manage spent lamps as universal waste. Universal waste spent lamps must be stored in a closed and labeled container. This container must be properly labeled with the wording "**Universal Waste Lamp(s)**", "**Waste Lamp(s)**", or "**Used Lamp(s)**". Gorman-Rupp Industries must also track the accumulation of the spent lamps to ensure spent lamps are **not stored for greater than 365 days**. This can be accomplished with recycling receipts or by marking the container with the accumulation start date (the day the first spent lamp is placed in the container).

No spent lamps were in storage at the time of the inspection.

Ohio EPA recommends that spent lamps be managed as a universal waste and recycled. If Gorman-Rupp Industries should choose the recycling option, you should submit to me the name of the recycling facility Gorman-Rupp Industries intends to use.

I have included the following fact sheets as attachments to this NOV letter: Universal Waste Rules for Handlers of Lamps, dated June 2005; Fluorescent Lamps: What You Should Know, dated January 2007; and Computer, Fluorescent Lamp and Ballast Recyclers, dated April 2008. These fact sheets are also enclosed

To abate this violation, Gorman-Rupp Industries must identify how the facility intends to properly manage the facility's spent lamps. This information should be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. During the inspection, I observed potential P2 opportunities associated with your operation(s). **P2 options that you may want to evaluate for this operation include sending your spent used oil filters off-site for recycling of the metal content.**

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The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at:
<http://www.development.ohio.gov/cdd/oeef/>

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (419) 373-3056. Ohio EPA has helpful information about this at the following web address:
<http://www.epa.ohio.gov/ocapp/>

The Division of Hazardous Waste Management (DHWM) has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Enclosed is a copy of the checklists that I completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at:
<http://www.epa.ohio.gov/dhwm/>

Should you have any questions, please feel free to call me at 419 (373-3056).

Sincerely,



Gary S. Deutschman
Environmental Specialist III
Division of Hazardous Waste Management
/lb

pc: John Smith, Maintenance Manager, Gorman-Rupp Industries
Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO

~~DHWM, NWDO File - General file, Richland County~~

ec: Gary Deutschman, DHWM, NWDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

Send to Central Office <input type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No. Site Name Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD004154183		Website: gripumps.com (Optional)	
	Name: Gorman Rupp Industries			
	Street Address: 180 Hines Avenue			
	City, Town, or Village: Bellville		State: OH	
	County Name: Richland		Zip Code: 44813	
	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"/>
	333996			
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: E	Last Name: Smith	
	Title: Maintenance Manager			
	Phone Number: 419-886-3001		Phone Number Extension:	
	E-Mail Address: jessmith@gormanrupp.com			
	Fax Number: 419-886-2338		Fax Number Extension:	
	Street or P.O. Box:			
	City, Town or Village:			
	State:		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 Gormann_Rupp Company		Date Became Owner (mm/dd/yyyy):	
	Owner Type: <input checked="" type="checkbox"/>	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 type="checkbox"/>
			Other <input type="checkbox"/>	
	Street or P.O. Box: PO BOX 1217			
	City, Town or Village: Mansfield		Owner Phone #:	
	State: Ohio		Country: USA	
			Zip Code: 44901	
	Name of Site's Operator: Gorman-Rupp Industries		Date Became Operator (mm/dd/yyyy):	
	Operator Type: <input checked="" type="checkbox"/>	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 type="checkbox"/>
			Other <input type="checkbox"/>	
	Street or P.O. Box: 180 Hines Avenue			
	City, Town or Village: Bellville		Operator Phone #: 419-886-3001	
	State: Ohio		Country: USA	
			Zip Code: 44813	

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE:

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES
<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))
<input type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to DAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001 D018 D039 D040

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:	Paul Bisel
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
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)
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Gary Deutschman		08/24/2010
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Comments:
 Facility intends to act as a small quantity universal waste handler for fluorescent lamps generated on-site.

PROCESS WASTE, P2 SUMMARY SHEET

Facility Name: Gorman-Rupp Industries	Facility Type: Conditionally Exempt Small Quantity Generator	Date of Inspection: 8/24/10	EPA ID #: OHD004154183
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Waste Generated			On- or Off-Site Management	P2 Activities		
Process/Activity Generating Waste (e.g. plating bath, machining baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility	Current P2 Activities	P2 Opportunities
1	Battery Replacement Spent Lead Acid Batteries	1 / five years		Sanders Lead Company 100 Sanders Road, Troy, Alabama 36079	Shipped for Smelting, Treatment	off-site Lead Acid
2	Parts Cleaning D001/D018/ D039/ D040 Spent Solvent	5 gallons/ Quarterly		Safety Kleen, 354 Portage Blvd., Kent, Ohio, 330-673-3340	Recycled	
3	Parts Cleaning Oily Sludge	55 gallons/ year		Sensmeier Oil Company, 375 North Main Street, Mansfield, Ohio 44902	Recycled	
4	Lighting Spent Fluorescent Light Bulbs	Varies		Disposed as Solid Waste		Recycling

REMARKS-GENERAL INFORMATION

General Process Information: Manufacturer of OEM Fluid Flow Pumps

Regulatory/Enforcement History (if applicable):

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 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.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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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"). If so, complete the Small Quantity Generator Requirements checklist.

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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
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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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

OAC 3745-266-80 SPENT LEAD ACID BATTERIES BEING RECLAIMED

1.	Has the handler of reclaimed batteries notified Ohio EPA or US EPA of regulated waste activity?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are the handler's batteries reclaimed through regeneration (such as by electrolyte replacement)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: If yes, the handler is subject to OAC Chapter 3745-51 and OAC rule 3745-52-11</i>		
3.	Are the handler's batteries reclaimed other than through regeneration?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, does the handler:	
	i. Generate, collect, and/or transport these batteries?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii. Store these batteries but is not the reclaimer?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii. Store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv. Not store these batteries before reclaiming them?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answer to any question 3ai through 3aiv is yes, the handler is subject to OAC Chapters 3745-51 and 3745-270, and OAC rule 3745-52-11. If the handler stores batteries before reclaiming them, the handler is subject to permitting requirements (e.g., general or interim standard facilities). Complete other appropriate checklists (e.g., LDR, TSD).</i>		
4.	Has the handler adequately evaluated all waste generated at their facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>