



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Williams County Engineer's Office
Hazardous Waste
Complaint # 2810
Williams County
Return to Compliance

March 9, 2009

Mr. Willis R. Allomong, Operations Manager
Williams County Engineer's Office
12953 County Road G
Bryan, Ohio 43506

Dear Mr. Allomong:

Thank you for your responses to Ohio EPA's September 24, 2008, Notice of Violation letter (NOV). On August 25, 2008, Ohio EPA received the following information via fax:

- ❖ Material Safety Data Sheets (MSDS)s for your diesel fuel and asphalt emulsion.

On August 27, 2008, via fax Ohio EPA received the following:

- ❖ The Chain of Custody for your August 22, 2008, sample collected from the spill of diesel fuel/asphalt waste.

On September 19, 2008, via fax Ohio EPA received the following:

- ❖ The non-hazardous waste manifests for the disposal of the waste generated from the spill of diesel fuel/asphalt waste on August 22, 2008, showing disposal at the Williams County Landfill September 17, 2008.

On September 30, 2008, via fax Ohio EPA received the following:

- ❖ Waste evaluation information (analytical) for one sample of the waste generated from the spill of diesel fuel/asphalt waste on August 22, 2008, collected on September 2, 2008, indicating this material was non-hazardous.

On October 24, 2008, via postal mail Ohio EPA received the following information:

- ❖ MSDS for your diesel fuel.
- ❖ Pictures of all of your used oil containers labeled "Used Oil".
- ❖ Pictures of your used diesel fuel, used filters for recycling, and used antifreeze labeled as such.

- ❖ MSDS for your parts washing solvent.
- ❖ MSDS for the cleaner for the parts washing solvent.
- ❖ Receipts for the pick-up of your used oil by DISC Environmental Service, Inc. (DISC)
- ❖ A letter with the following information:
 - a) additional information pertaining to the diesel fuel / asphalt mixture you generate;
 - b) DISC is now disposing of your used antifreeze;
 - c) you are now recycling all used oil filters as scrap metal with Carlson Recycling;
 - d) your parts washer has not been serviced to date;
 - e) you are now managing your fluorescent bulbs as universal waste and recycling with Environmental Recycling Group.

On November 18, 2008, via fax Ohio EPA received the following:

- ❖ Waste evaluation (analytical) for the second sample of the waste generated from the spill of diesel fuel/asphalt waste on August 22, 2008, collected on August 22, 2008, indicating this material was non-hazardous.

On March 4, 2009, I received, via email, a statement that upon the next generation of your diesel fuel/asphalt mixture (waste) Williams County Engineer's Office (WCE) will properly evaluate this waste stream to determine all appropriate hazardous characteristics to determine if this waste stream is hazardous or non-hazardous. Based on this analysis, WCE will then determine how to manage and dispose of this material.

My review of this documentation reveals that WCE has adequately demonstrated abatement of the violations listed below discovered during the September 3, 2008, compliance evaluation inspection & complaint investigation as outlined below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11 Waste Evaluation.	September 3, 2008	A.) March 4, 2009 B.) October 24, 2008; C.) October 24, 2008
2. OAC 3745-279-22 (C) (1) Used oil storage requirements -proper labels.	September 3, 2008	October 24, 2008

WCE has also satisfied the Area of Concerns noted in the September 24, 2008, NOV as outlined below:

1. Satisfied with the submittal of the September 30, 2008, and November 18, 2008, response indicating the waste generated from the spill of diesel fuel/asphalt waste on August 22, 2008 was non-hazardous and the September 19, 2008, response which included the non-hazardous waste manifests for the disposal of the waste generated from the spill of diesel fuel/asphalt waste on August 22, 2008.

Mr. Willis R. Allomong, Operations Manager

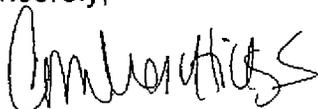
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2. Satisfied with the October 24, 2008 response. Please note that upon the first generation of the sludge from the parts washer, WCE must ensure to properly evaluate this waste to determine whether it is a hazardous or non-hazardous waste.
3. Satisfied with the October 24, 2008 response.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/llr

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO, File, Williams County Engineer's Office
ec: Amber Hicks, 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 all applicable regulations.