



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-8388

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

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

Re: RemTec International
~~OHR-000-037-390~~ **OH D 043643360**
Hazardous Waste
Wood County
Notice of Violation

February 15, 2007

Mr. Scott Warner
RemTec International
1100 Haskins Road
Bowling Green, Ohio 43402

Dear Mr. Warner:

On June 21 and 23, 2006, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of RemTec International (RemTec) located at 1100 Haskins Road, Bowling Green, Ohio. This inspection was conducted to determine RemTec's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). On June 21, 2006, RemTec was represented by Tim Kearney, Ron Marcus, and you. Ohio EPA was represented by Ed Pulido and the writer. On June 23, 2006, RemTec was represented by Ron Marcus. Ohio EPA was represented by the writer. The inspection included a tour of facility operations and a review of facility paperwork. This letter will explain the violation I found, what you need to do to correct this violation, and one general comment.

RemTec is a recycler/reclaimer of chlorofluorocarbons and halons. Waste generated at the facility is Freon which cannot be recycled or reclaimed due to cross-contamination. Other wastes generated at the facility include used oil and fluorescent light bulbs.

During the inspection, I provided you with the following materials: a document listing the generation limits for the three categories of hazardous waste generators, the characteristics of a hazardous waste, and Table 1 out of OAC Rule 3745-51-24 listing toxicity characteristic wastes (D004 - D043) and their respective maximum concentrations; a list of lamp recyclers; and the Ohio EPA Fact Sheets: Universal Waste Rules for Handlers of Lamps - December 2004; The Regulation of Used Oil: An Overview for Ohio Businesses, Used Oil Generators.

I 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. **Waste Evaluation - OAC Rule 3745-52-11**

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

Mr. Scott Warner
February 15, 2007
Page Two

RemTec failed to have waste evaluation documentation for the cross-contaminated Freon (chlorofluorocarbons) generated at the facility.

RemTec is currently incinerating all of this waste material (other than R-11 and R-12) in their on-site Arc Plasma Destruction Facility. Prior to this, RemTec shipped this material to Onyx Environmental Services (Onyx) for incineration. The last shipment of waste off-site was on March 3, 2006. It appears this material was shipped as a hazardous material (not as a hazardous waste). However, RemTec filed an annual report with Ohio EPA indicating this material was a hazardous waste (D001, F003, F005). On October 24, 2006, a representative of Onyx left me a message on my voice mail stating that Onyx has this material profiled as a non-hazardous waste. RemTec must determine whether the waste they generated is hazardous or non-hazardous waste.

The waste evaluation can be conducted through one of three options: 1) RemTec must apply generator knowledge of the hazardous characteristic(s) of the waste in light of the materials or the processes used through adequate documentation (information from customers, Material Safety Data Sheets, process descriptions, etc.); or 2) RemTec must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis [Toxicity Characteristic Leaching Procedure (TCLP)] which lists constituents present and at what concentration. RemTec must sample this waste stream for any characteristics or constituents that could reasonably be expected to be found in this waste stream as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846. RemTec may run total concentrations for these constituents as a screening tool. If the concentration(s) are detected for any of these constituents at or above the regulatory limit, a TCLP may be required to ensure these constituent(s) are not present above the Ohio EPA regulatory level; or 3) a combination of options one and two.

RemTec shall submit to me the analytical and/or generator knowledge indicating the proper evaluation of this waste. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

In addition, RemTec must provide information pertaining to the waste evaluation of the cylinders received at your facility. RemTec must document how it is determining if the waste cylinders received on site have any hazardous waste constituents (either characteristic or listed) associated with them. This may be done either by documenting the generation process and waste evaluation of the original waste from information provided by your customers on whether the material is hazardous or non-hazardous, or by providing documentation of your profiling process before accepting the waste cylinders at your facility.

For example: How did this waste become generated (by what process)? Was the waste generated a household hazardous waste or was it generated from a business? Did the generator provide RemTec information on whether this material was hazardous? Have all hazardous characteristics been evaluated for (D001 - D043)?

RemTec must provide additional information of the waste cylinders including information pertaining to RemTec's customers.

Mr. Scott Warner
February 15, 2007
Page Three

I have enclosed the fact sheets, Identifying your Hazardous Waste and Use of Generator Knowledge In Complying with OAC Rule 3745-52-11 Hazardous Waste Evaluation which you may find useful. I have also included a letter from U.S. EPA which may assist you in evaluating your waste.

If you perform sampling, Ohio EPA will use the data you provide, in addition to other documentation, to make regulatory decisions concerning the wastes tested. The data you submit should be reviewed using a data review process, referred to as data validation, to confirm the validity of your data prior to submission. Data validation includes a review of the following components: laboratory test methods, laboratory data completeness, documentation of holding time(s), chain(s) of custody, and quality assurance/quality control (QA/QC) data. To confirm the validity of your data, you may use Ohio EPA's tier 1 data validation plan review form which can be obtained at http://www.epa.state.oh.us/dhwm/tier_1_data_validation_manual.html. Ohio EPA may request the documentation needed to confirm the validity of the data submitted.

Please submit a brief narrative of each sampling event which includes: process generating the waste, point in the process the sample was obtained, sampling techniques used to obtain the sample and a description of how this sample was determined to be a representative sample of the waste tested.

In addition, if sampling is performed, please notify me at least seven days prior to taking the samples so that I or an Ohio EPA representative may be present.

General Comment:

1. On December 29, 2006, Chris Maslo and I met with your facility to discuss this waste evaluation. During this meeting, you explained that RemTec no longer ships cross-contaminated Freon off-site for disposal. This material is now treated on-site by incineration in an Arc Plasma Destruction Facility. You had a question as to whether R-11 and R-12 could be treated on-site. Specifically, whether this material is classified as a hazardous waste with the hazardous waste codes U121 and U075, respectively, as your facility does not have a permit to treat, store and dispose of hazardous waste. Thus, RemTec is currently only storing waste R-11 and R-12 until you receive direction for the management of this material. The information you provide pertaining to the above waste evaluation violation will assist Ohio EPA in advising RemTec on the correct management of this material. Thus, I will be in contact with you pertaining to this issue.

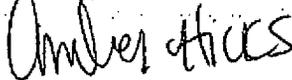
RemTec currently recycles their hydraulic oil with Waste Away and their lamps with Environmental Recycling. If you find additional ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. Ohio EPA has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service. You can find more information at the following web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Mr. Scott Warner
February 15, 2007
Page Four

Enclosed you will find a copy of the checklists that I completed during the inspection. Please address all correspondence to Amber Hicks, Ohio Environmental Protection Agency, Northwest District Office, Division of Hazardous Waste Management, 347 North Dunbridge Road, Bowling Green, Ohio 43402. Should you have any questions, please feel free to call me at (419)373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

/cs

Enclosures

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO File: RemTec International (w/original checklists)

ec: John Pasquarette, DHWM, NWDO
Amber Hicks, DHWM, NWDO
Chris Maslo, DHWM, NWDO

<p>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.</p>
--

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: OHR 000 037 390

3. Site Name Name: RemTec International Website (optional): www.remtec.net

4. Site Location Information
 Street Address: 1100 Haskins Road
 City, Town, or Village: Bowling Green State: OH
 County Name: Wood Zip Code: 43402

5. Site Land Type (check only one)
 Private County District Federal Indian Municipal State Other

6. NAICS code(s) www.census.gov/epcd/www/naics.html
 A. 422690 B.
 C. D.

7. Facility Representative:
 First Name: Scott MI: Last Name: Warner
 Phone Number: 419-867-8990 Phone Number Extension:
 E-Mail Address: scott.warner@remtec.net
 Fax Number: 419-867-3279 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.
 A. Name of Site's Legal Owner: Date Became Owner (mm/dd/yyyy):
 Owner Type: Private County District Federal Indian Municipal State Other
 Mark with an X
 Street or P.O. Box:
 City, Town, or Village: Owner Phone #:
 State: Country: Zip Code:
 B. Name of Site's Operator: Date Became Operator (mm/dd/yyyy):
 Operator Type: Private County District Federal Indian Municipal State Other
 Mark with an X
 Street or P.O. Box:
 City, Town, or Village: Operator Phone #:
 State: Country: Zip Code:

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
 Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities
 (choose only one of the following categories)

<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 6. Underground Injection Control Facility

<p>B. Universal Waste Activities</p> <p><input checked="" type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):</p> <p><input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).</p> <p><input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)</p> <table border="0"> <tr> <td></td> <td style="text-align: center;"><u>Generated</u></td> <td style="text-align: center;"><u>Accumulated</u></td> </tr> <tr> <td>A. Batteries</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>		<u>Generated</u>	<u>Accumulated</u>	A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>C. Used Oil Activities</p> <p><input checked="" type="checkbox"/> 1. Used Oil Generator</p> <p>2. Used Oil Transporter Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> Transporter <input type="checkbox"/> Transfer Facility</p> <p>3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner</p> <p><input type="checkbox"/> 4. Off-Specification Used Oil Burner</p> <p>5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil <input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner</p>
	<u>Generated</u>	<u>Accumulated</u>														
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>														

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

N	Announced?	Additional Facility Representatives:
N	Tanks?	Other comments:
N	Containers?	

13: Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Amber Hicks	Ed Pulido	6-21-06/13:24-15:15; 6-23-06/11:00-13:00

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 DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: RemTec Facility Type: LQG EPA ID#: OHR 000 037 390

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	P2 Activities
1 Recycling/reclaiming of freon	Contaminated freon	Unknown - 52-11 cited.	~19205 lb (generated once per year)	Container	Currently, destroying in Arc Plasma Destruction facility (except for R-11 and R-12).		Prior waste sent off-site to : Onyx Environmental Services - IL	
2 Recycling/reclaiming of freon	Used oil	NA		Container	NA		Waste Away - OH	Recycled.
3 Lighting	Fluorescent bulbs	NA	Unknown	NA* No lamps were observed in storage (none in storage).	NA		Environmental Recycling - OH	Recycled.
4 Filtering of halon system bottles (removal of moisture)	Filters	NA	Unknown	None	NA		Solid waste disposal.	