



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Rosenboom Machine & Tool
f.k.a. Green Manufacturing, Inc.
Hazardous Waste Inspection
Complaint #2659
Wood County
OHD 005 052 782
Return to Compliance

May 1, 2008

Mr. Bill Barringer
Health and Safety Manager
Rosenboom Machine & Tool
P. O. Box 408
Bowling Green, Ohio 43402

Dear Mr. Barringer:

Thank you for your April 22, 2008, response to Ohio EPA's March 25, 2008, Notice of Violation letter. My review of this documentation reveals that Rosenboom Machine & Tool (RMT) has adequately demonstrated abatement for the violations discovered during the March 3, 2008, inspection.

The following is a summary of the violations cited and your compliance with respect to each:

1. **OAC Rule 3745-52-11: Waste Evaluation**

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. RMT did not properly evaluate the spent sand blasting media from the sand blaster in the maintenance area.
- b. RMT did not properly evaluate the paint booth filters.

RMT submitted analytical results indicating the sand blasting will be disposed as hazardous waste (D008) from now on. In addition, the paint booth filters were found to be non-hazardous and they will be disposed of as such. These violations have been abated.

2. **OAC Rule 3745-52-42(B): Manifest Requirements**

A small quantity generator of hazardous waste who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within sixty days of the date the waste was accepted by the initial transporter must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the Ohio EPA.

At the time of this inspection, RMT did not produce return copies of the hazardous waste manifests signed by the disposal facility. RMT also did not produce evidence that a legible copy of the manifest, along with some indication that it has not received confirmation of delivery, had been submitted to the Ohio EPA.

On April 8, 2008, I reviewed original, signed copies of the manifests at the facility. This violation has been abated.

3. **OAC Rule 3745-52-34(D)(4): Accumulation Time of Hazardous Waste – Labeling**

A small quantity generator of hazardous waste may accumulate waste for 180 days and/or conduct treatment of hazardous waste that is generated onsite without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.

RMT failed to mark the date when accumulation began on seven (7) drums of paint/solvent-related waste in the 180-day storage accumulation area.

This violation was abated during the inspection.

4. **OAC Rule 3745-52-34(D)(5)(b): Preparedness and Prevention**

A small quantity generator of hazardous waste may accumulate waste for 180 days and/or conduct treatment of hazardous waste that is generated onsite without an Ohio hazardous waste permit, provided that the information required to summon for help in case of an emergency including location of fire and spill control equipment, and, if present, fire alarm(s), is posted by the telephone. RMT failed to post the above described information.

RMT submitted copies of the emergency response and spill equipment posted information. This violation has been abated.

5. **OAC Rule 3745-273-14(E); Universal Waste Lamps – Labeling**

A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste. Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)".

RMT failed to properly label two containers of universal waste lamps.

This violation was abated during the inspection.

6. **OAC Rule 3745-279-22(C): Used Oil Generator Standards – Labeling**

A generator of used oil shall label or mark clearly storage containers, aboveground tanks and fill pipes used for underground storage tanks with the words "Used Oil". RMT failed to label several containers throughout the facility.

RMT submitted photos of the labeled used oil containers. Therefore, this violation has been abated.

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7. **OAC Rule 3745-279-22(D): Used Oil Generator Standards – Response to Releases**

Upon detection of a release of used oil to the environment a generator ***must clean up and manage properly the released used oil.***

RMT failed to cleanup a release of used oil from the oil decanter set up in the maintenance area. A puddle of used oil was observed around the back of the used oil 250-gallon container.

RMT submitted documentation regarding the cleanup of the used oil. The generated waste was disposed of as used oil related waste by PSC Industrial Services. This violation has been abated.

Should you have any questions, please feel free to contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/cs

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, Supervisor, DHWM, NWDO
~~DHWM, NWDO File: Rosenboom Machine & Tool, f.k.a. Green Manufacturing~~

ec: Ed Pulido, DHWM, NWDO

NOTE: 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.