



State of Ohio Environmental Protection Agency

Northwest District Office

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

April 19, 2007

**Re: Ginosko Laboratories, Inc.
Laboratory Initiative
Wyandot County
RTC**

Mr. Bill Pfeiffer
Ginosko Laboratories, Inc.
17875 Cherokee Street
Harpster, Ohio 43323

Dear Mr. Pfeiffer:

I received your responses on January 8, 2007; January 26, 2007; and February 12, 2007; to address violations originally cited in my April 17, 2006, Notice of Violation. You included information on waste evaluation, waste handling, and used/waste oil.

The following is a summary of the violations cited as a result of the March 8, 2006, inspection. All violations cited as a result of that inspection have been corrected as follows:

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

- A) Ginosko failed to determine if the waste lamps generated on-site are a hazardous waste. **This violation has been previously abated.**
- B) Ginosko failed to determine if the sample waste that was being discharged into the septic system was a hazardous waste. Ginosko was pouring leftover wastewater samples down the drain into the septic system.

In your January 8, 2007, response, you provided a summary of operational changes to your laboratory that will eliminate all acid and caustic substances from being introduced into the septic system.

In your January 26, 2007, response, you provided a more legible copy of the analytical that was performed for the drums of waste that were shipped off-site. According to this analytical, that waste was non-hazardous.

You also provided information in this response that explained how you determined that your waste was homogeneous. A copy of the tracking log that you keep for samples was also attached to your response.

This violation is abated.

- C) Ginosko failed to determine if the spent chloroform was a hazardous waste. At the time of the inspection, the spent chloroform was generated after extractions were complete, and the spent chloroform was being evaporated.

In your February 12, 2007, response, you provided additional analytical information on your spent filters from distillation of the spent chloroform and hexane. This included TCLP metals and VOCs. This violation is abated.

- D) Ginosko failed to determine if the spent hexane was a hazardous waste. At the time of the inspection, the spent hexane was being generated after extractions with about 1 milliliter (ml) of solvent left in a small vial, and after cleaning of extraction equipment with about 5 ml left in the container. These containers have been placed under the hood to evaporate to dryness, and then the containers are thrown away with the solid waste. According to the material safety data sheet (MSDS) reviewed by Ohio EPA, the spent hexane had a flash point of -23 degrees Celsius (C), which would make it an ignitable hazardous waste (D001).

In your January 26, 2007, response, you explained that hexane is not used to clean extraction equipment in your laboratory. You further explained that the extraction equipment is cleaned using dish detergent and water.

This violation is abated.

- E) Ginosko failed to determine if the spent methylene chloride was a hazardous waste. Methylene chloride waste is generated from extractions of analytical samples at your laboratory. The spent methylene chloride is managed and disposed of in the same way as the spent hexane. According to OAC rule 3745-51-31, spent methylene chloride would be considered an F002 listed hazardous waste.

This violation was previously abated.

In my April 17, 2006, NOV, you were asked to further address these violations by submitting an explanation as to how you will evaluate any future wastes generated at the laboratory. Ginosko submitted information in the January 26, 2007, response that stated that all future waste that does not conform to normal household hazardous waste will be evaluated for disposal using TCLP. This information was adequate to address this issue.

**2. Unpermitted treatment and disposal
ORC Section 3734.02 (E) & (F)**

Ginosko failed to obtain a hazardous waste facility installation and operation permit in order to conduct treatment and disposal of a hazardous waste. Ginosko was evaporating hazardous waste spent solvent (D001 hexane, and F002 methylene chloride) to the air, thus, illegally treating the spent solvent, and disposing of the spent solvent to the air. Ginosko generates about 100 ml of each of these two solvents per month.

Additional information on the hexane was provided in the January 26, 2007 response, and was summarized in violation #1(D).

This violation is abated.

**3. Used Oil Labeling
OAC Rule 3745-279-22(C)(1)**

Ginosko failed to label their used oil container with the words "Used Oil". Ginosko had a one gallon jug of used oil generated from their analytical equipment that was not labeled "Used Oil".

This violation was previously abated.

**4. Waste shipment off-site.
ORC Section 3734.02(F)**

Ginosko failed to provide information that documented delivery of your hazardous waste to a permitted treatment, storage, or disposal facility (TSDF). This information was requested during the inspection, and in the April 17, 2006, NOV.

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This violation was previously abated.

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

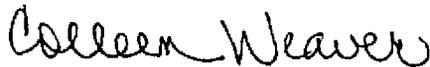
Ginosko failed to provide waste evaluation data for the spent oil generated from the oil and Grease analysis.

You stated that you generate about 10 microliters per sample of spent oil during each analysis and the oil will be collected in a container marked spent oil. The oil will be disposed of when there is enough to make it cost effective for you to do so, and will be sent to a licensed disposal facility. You also stated that the spent oil is primarily fatty acids as found in food grade cooking oil and is nonhazardous.

This violation was previously abated.

All violations cited in my April 17, 2006, NOV have been corrected. If you have any questions, please contact me at 419-373-3059.

Sincerely,



Colleen Weaver
Environmental Specialist 3
Division of Hazardous Waste Management

/lb

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO

~~NWDO\Ginosko\Files~~

ec: Eric Schultz, DHWM, CO
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