



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura H. Powell, Acting Director

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

January 12, 2007

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

Dear Mr. Pfeiffer:

I received your response to my October 27, 2006, Partial Return to Compliance (PRTC) letter on December 18, 2006. This was in response to violations originally cited in my April 10, 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. Please review this summary, and submit the required information **within 15 days** of your receipt of this letter:

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 December 18, 2006, response, you provided a log of the beginning pH and the final pH for samples routinely discharged. Since the pH of discharged samples was logged between 8.0 and 9.0, the discharged waste would not be considered hazardous for pH.**

**In your July 20, 2006, response, you stated that five drums of laboratory waste from analysis, and waste from samples collected were disposed of. In your December 18, 2006, response, you stated that this was an error.**

**You stated that there were only two 55-gallon drums, and one 20-gallon container that were disposed of consisting of 130 gallons total. This waste was sent through ERS of Ohio, Inc. on June 17, 2004. You also sent analytical that was completed prior to the shipment of this waste. Although, it appeared that the waste was non-hazardous when it was shipped off-site, some of the analytical was inadequate or unreadable, and the documentation of how the samples were placed in these containers was not provided. You stated that the waste was heterogeneous or it would have been segregated. If this is the case, you must provide the documentation on how you are making this determination. You must explain how you are tracking the samples that are being placed into each drum (from what types of analytical, what types of facilities, or sample numbers and the source of where they came from, etc.). If you are not currently tracking this information, you must provide how you plan to track this information in the future to ensure proper waste evaluation.**

**This violation is not 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 December 18, 2006, response, you provided analytical information on your spent filters from distillation of the spent chloroform and hexane. The filters were only analyzed for pH and flashpoint. In order to have a complete waste evaluation, you must also analyze these filters for TCLP metals and VOCs.**

**This violation is not 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).

**You stated in your December 18, 2006, response that there is no waste left from hexane used in the Oil & Grease analyses. However, during the inspection, it was also explained to Ohio EPA that hexane was used to clean extraction equipment.**

**If this is not the case, you must address this issue, and explain how the extraction equipment is cleaned if hexane is not used.**

**This violation is not 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.

**Your December 18, 2006, response indicated that the vials with the spent methylene chloride are being collected in a Teflon container. You stated that these vials will be disposed of through an approved disposal facility as an F002 hazardous waste.**

**This violation is 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. Some examples of what is necessary is: tracking of what waste samples are placed in waste containers (including where samples are from, and what analyses was performed), this may include an example of a log, etc., of what you may use to keep track of these items; a full explanation of what types of steps you plan to take to track any waste you generate in the future. I have included the fact sheet entitled "Identifying Your Hazardous Waste," and the guidance document entitled "Use of Generator Knowledge In Complying with OAC rule 3745-52-11 Hazardous Waste Evaluation," to help you determine your plan for evaluating your wastes in the future.

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.

In your July 20, 2006, response, you stated that Ginosko will no longer evaporate any of the D001 hexane, or F002 methylene chloride spent wastes into the air. You are collecting the methylene chloride vials for disposal as an F002 hazardous waste and the hexane is to be recovered and reused. As summarized in the previous violation, other information had been provided about hexane during the inspection.

**Additional information on the hexane was requested in violation #1(D).**

**This violation is not 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 corrected.**

**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.

**In your December 18, 2006, response, you stated the COD waste accumulated on site is presently about 19.25 liters collected over a period of 15 years at the rate of about 25 ml per week. You stated that it is accumulated with other spent oil in an explosion proof cabinet, but is not combined with the other oils. According to your records, you have never disposed of COD waste, and the COD analysis is not requested often. You stated that the COD waste is considered a hazardous waste (D002, D007, D009).**

**This violation is 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.

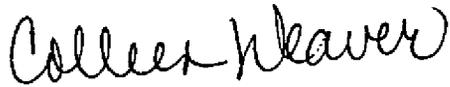
**In your July 20, 2006, response, you provided TCLP analysis for the spent/waste oil. This particular spent/waste oil was non-hazardous. You stated previously that any samples of oils received for analyses are sent back to the source.**

**This violation is abated.**

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If you have any questions, please contact me at 419.373.3059.

Sincerely,



Colleen Weaver  
Environmental Specialist 3  
Division of Hazardous Waste Management

/lr

Enclosure

pc: Cindy Lohrbach, DHWM, NWDO  
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