

Monroe County
Site - Gen



State of Ohio Environmental Protection Agency

Southeast District Office

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

May 21, 2007

**MONROE COUNTY
GENERAL FILE
(SWISS HILLS CAREER CENTER)
RCRA/UOG
NON-NOTIFIER**

Mr. Marc Ring
Swiss Hills Career Center
46601 State Route 78
Woodsfield, Ohio 43793

Dear Mr. Ring:

On May 9, 2007, Trevor Irwin and I inspected the Swiss Hills Career Center to determine Swiss Hills Career Center's compliance with Ohio's solid and hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection we also helped you identify ways to prevent pollution by reducing waste. This letter will explain the violations we found and what you need to do to correct the violation.

We found the following violations of Ohio's solid and hazardous waste laws. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

- (1) **Used oil storage requirements for generators, OAC rule 375-279-22(C)**: Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".

During the inspection, the used oil tank containing used oil was not labeled as required by this rule. To demonstrate compliance with this rule, photographic documentation must be submitted to Ohio EPA demonstrating that the used oil tank has been labeled as required.

- (2) **Used oil storage requirements for generators, 3745-279-22(A)**: Used oil generators must store used oil in tanks, as defined in rule 3745-279-01 of the Administrative Code; or in containers, as defined in rule 3745-279-01 of the Administrative Code.

During the inspection, used oil was being stored in oil pans outside near the scrap metal staging area. The oil pans would not be considered containers or tanks. The used oil must be placed in the used oil tank as required by this rule. To demonstrate compliance with this rule, please develop a standard operating procedure (SOP) for the automotive technology and agriculture mechanics programs which outline the proper used oil management procedures. This SOP must be posted in a prominent location in these two areas. In addition, a copy of this SOP must be submitted to Ohio EPA.

(3) **Ohio Revised Code (ORC) chapter 3734.03 and Ohio Administrative Code (OAC) 3745-27-05(C):**

ORC 3734.03 states in part:

ORC 3734.03 - No person shall dispose of solid wastes by open dumping or open burning.

OAC 3745-27-05(C) states:

OAC 3745-27-05(C) - No person shall conduct, permit, or allow open dumping. . .

During the course of this inspection, a large burn pile was observed behind the agricultural mechanics shop. Several tires were observed to have been burned in this pile. Also, solid waste was observed to have been deposited over the slope adjacent to the scrap tire storage area.

All open burning activities must cease. All solid wastes must be removed from the property and either disposed of at a licensed solid waste landfill or taken to a legitimate recycling facility for disposal. Receipts of disposal must be forwarded to this office for proof of disposal.

Comments

- (a) During the course of this inspection, scrap tires were observed being stored behind the Automotive Technology shop. Improper storage of scrap tires poses several potential problems for the local residents, environment, and the emergency crews in the area. Scrap tires provide an optimal breeding ground for mosquitoes. Mosquitoes identified at tire piles in Ohio can carry St. Louis Encephalitis, La Crosse Encephalitis, Yellow Fever, Dengue Fever and West Nile Virus. These scrap tires need to be stored in a manner so that mosquito breeding is inhibited. Scrap tire fires are also a source of air pollution and can cause respiratory problems for those that breathe the smoke. Tire fires are also difficult for emergency crews to extinguish.

These tires need to be stored inside or under cover to inhibit the accumulation of rain water within the tire and to inhibit the incidence of fire.

Ohio law requires that anyone removing scrap tires for disposal must take the tires to either a licensed or registered scrap tire collection, recovery or disposal facility. Receipts from these facilities need to be on file at your facility to provide proof of proper disposal. Also, anyone transporting more than ten (10) scrap tires must be registered with Ohio EPA as a Scrap Tire Transporter.

As we discussed during the inspection, the waste thinners generated in the agriculture mechanics program can be mixed with the used oil as specified in OAC rule 3745 279-10(3). I have attached a guidance for used oil generators for your convenience. This guidance discusses the proper management of used oil and the options you have to dispose of the used oil.

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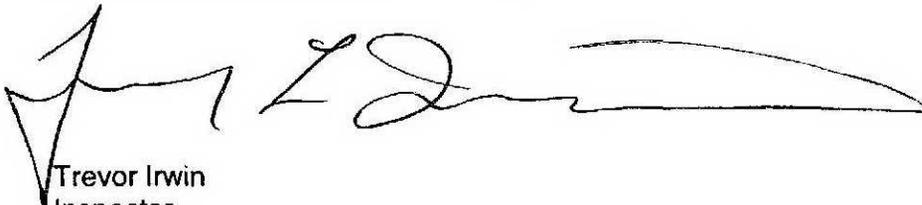
The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets at the following web address: <http://www.epa.state.oh.us/opp>. You can also find copies of the rules and other information on Ohio EPA's web page at <http://www.epa.state.oh.us>.

If you have any questions regarding waste management or pollution prevention activities, please call me at (740) 380-5278.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management



Trevor Irwin
Inspector
Division of Solid and Infectious Waste Management

MS/mlm

cc (w/attachments): Mike Staggs, Superintendent,

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 appropriate regulations.