



OHR000159475-001-05/27/2010

Hazardous Waste

NOV

ADAMS

MACA PLASTICS

05/27/2010



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

May 27, 2010

**ADAMS COUNTY
GENERAL FILE
(MACA PLASTICS)
DHWM-SEDO
NON-NOTIFIER**

Mr. Steve Cox
Maca Plastics
3455 Cross Road
Winchester, Ohio 45697

Dear Mr. Cox:

Thank you and Ms. Culbertson for accompanying Melody Stewart and me during Ohio EPA's May 19, 2010 inspection of your facility in Winchester, Ohio. We inspected Maca Plastics to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). In addition to the inspection, Ohio EPA investigated an anonymous complaint that was received by this office regarding your facility. This letter will explain any violations we found and what you need to do to address those violations; the results of our complaint investigation; and any general concerns we have and what you can do to address them.

During the inspection, we found the following violation of Ohio's hazardous waste laws:

- (1) ***OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators.*** Containers and above ground tanks used to store used oil at generator facilities must be labeled or clearly marked with the words "Used Oil."

Several drums containing used oil, stored under a truck trailer located on the concrete ramp behind facility, were not labeled with the words "Used Oil." The drums of used oil were correctly labeled during the inspection.

Maca Plastics has returned to compliance with this rule.

We also investigated an anonymous complaint that was received by this office, which alleged that your facility was improperly disposing of used oils and glycol solution in a storm drain behind the manufacturing building. We observed no evidence to substantiate the complaint.

Ohio EPA considers the complaint to be resolved.

GENERAL COMMENTS:

- **Housekeeping Issues – Used Oil.**
As we discussed with you during the inspection, any release of used oil (hydraulic oil, mineral oil, propylene glycol/water mixture) must be contained and cleaned up. Ohio EPA recommends that you stock a “spill kit” and keep it close to the area where used oils are stored. Any used oil clean up materials (absorbent material such as oil-dry and booms) can be bagged and placed in the trash to be handled by your regular solid waste handler.
- **Housekeeping Issues – Clean up of Dumpster Area and Adjacent Field.**
During the inspection, we observed plastic resin media outside the facility in the concrete ramp area near the solid waste dumpster. Plastic resin media was also seen in the grass and in the adjacent field behind your facility. As we discussed, since the plastic resin pellets cannot be used in the process once they have been discarded in this manner, they are considered a solid waste. The plastic resin media found in these areas should be cleaned up and managed as a solid waste with your regular solid waste handler. Ohio EPA recommends that Maca Plastics implement a mechanism to prevent the plastic resin pellets from being spilled and becoming a waste, and that any spilled resin pellets are immediately contained in some manner prior to disposal so the material does not run off-site. We noted that Maca Plastics had already started clean up of this area while Ohio EPA was on-site.
- **Storm Water/Run-off Prevention.** As we discussed, run-off of solid waste or other materials from your site into “waters of the state” is not permitted by Ohio EPA’s Division of Surface Water regulations. I have enclosed a general guidance on implementing a storm water pollution prevention program at your facility. If you have specific questions about developing a plan, please contact Aaron Wolfe in Ohio EPA’s Division of Surface Water, at 740-380-5277 or aaron.wolfe@epa.state.oh.us.
- I have also enclosed Ohio EPA’s Used Oil Generator Guidance and Universal Waste Guidance.

Enclosed, you will find a copy of the checklists that were completed during our inspection. You can find copies of the hazardous waste rules and other information on our division’s web page at <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dhwm>. Compliance assistance and pollution prevention information is available at: <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.

Mr. Steve Cox
Maca Plastics
May 27, 2010
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If you should have any questions or require assistance, please feel free to call me at 740-380-5237.

Sincerely,



Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

Enclosure

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.





Ohio Environmental Protection Agency

For Ohio EPA use only

Send to Central Office



RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

Completed forms that are required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us

<p>Site EPA ID No.</p> <p>Site Name</p> <p>Site Location Information</p> <p>Site Land Type (check only one)</p> <p>NAICS codes www.census.gov/epcd/www/naics.html</p>	<p>EPA ID Number:</p> <p>Name: Maca Plastics</p> <p>Website (Optional): <u>www.macaplastics.com</u></p> <p>Street Address: 3455 Cross Road</p> <p>City, Town, or Village: Winchester State: OH</p> <p>County Name: ADAMS Zip Code: 45697</p> <p>Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p>
<p>Facility Representative</p> <p>Additional names can be recorded in comments section.</p> <p>Only provide address information if it is different than the site address.</p>	<p>First Name: Steve MI: Last Name: Cox</p> <p>Phone Number: (937) 544-8618 Phone Number Extension: 15</p> <p>E-Mail Address: scox@macaplastics.com</p> <p>Fax Number: (937) 544-7160 Fax Number Extension:</p> <p>Street or P.O. Box: same as above</p> <p>City, Town or Village:</p> <p>State: Zip Code:</p>
<p>Legal Owner And Operator</p> <p>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</p>	<p>Name of Site's Legal Owner: Maca Plastics Date Became Owner (mm/dd/yyyy):</p> <p>Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Street or P.O. Box: same as above</p> <p>City, Town or Village:</p> <p>State: Owner Phone #: Country: Zip Code:</p> <p>Name of Site's Operator: Maca Plastics Date Became Operator: 1992</p> <p>Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/></p> <p>Street or P.O. Box: same as above</p> <p>City, Town or Village:</p> <p>State: Operator Phone #: United States Zip Code:</p>

VIOLATIONS CITED? Yes No

TYPE OF HANDLER (MARK AS APPROPRIATE)

Not a Generator UNKNOWN: Cited for violation of 3745-52-11

Large Quantity Generator (LQG)

Small Quantity Generator (SQG)

Conditionally Exempt Small Quantity Generator

U.S. Importer of Hazardous Waste

Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY

- | | |
|---|--|
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Underground Injection Control Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | |

UNIVERSAL WASTE ACTIVITIES

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). 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; just indicate the date of the most recent source record.

Use this area to describe inspection conditions and additional information.

Announced Yes No Additional Facility Representatives: **Melinda Culbertson**
 Tanks Yes No
 Containers Yes No

INSPECTOR(S)

Vicky German

Melody Stewart

INSPECTION DATE

5/19/2010

COMMENTS

Used oil wastes collected in 55-G drums prior to shipment off-site for recycling.

Spent fluorescent lamps are collected in prepaid lamp shipping containers and managed as universal waste.

USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes:

	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	--

 - a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]

	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	--
2. Is used oil used as a dust suppressant? [3745-279-12(B)]

	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	--
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?

	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	--

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so,

	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	--

 - a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]

	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	--

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]

	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
--	--

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]

	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]

	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]

	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
--	--

Containers holding used oil were not labeled as "Used Oil". Maca Plastics labeled the containers during the inspection, abating this violation.
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release?

	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--
 - b. Contained the release?

	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATERS

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23]
If so: Yes No N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

WASTE ACTIVITIES SUMMARY

Maca Plastics

Winchester, Ohio

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process	Waste Generated	EPA Waste Code	QTY Generated per Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Cleaning metal molds	Spent parts cleaner solvent - petroleum naphtha	NA	60 G/yr	NA	NA	1 Crystal Clean Parts Cleaner located in manufacturing building	Heritage-Crystal Clean Cincinnati OH Recycled/Reclaimed
Injection Molder	Spent hydraulic oil	NA Used Oil	500-600 G/yr Amt. includes ALL used oils generated	55-gallon drums	NA	Drums stored under a truck trailer located on the concrete ramp behind facility, near Rumpke solid waste dumpster	Oil Distributing Company Cincinnati OH Recycled/Reclaimed
935-Ton Injection Molder machine	Spent mineral oil	NA Used Oil	Varies See above	NA	NA	NA -- liquid is removed via vacuum truck once yearly	Oil Distributing Company Cincinnati OH Recycled/Reclaimed
Release of plastic from metal molds	Chiller Unit Water - Spent propylene glycol (about 10%) and water mixture	NA Used Oil	Varies See above	55-gallon drums	NA	Drums stored under a truck trailer located on the concrete ramp behind facility, near Rumpke solid waste dumpster	Oil Distributing Company Cincinnati OH Recycled/Reclaimed
Lighting changes	Spent fluorescent lamps	NA Universal Waste	Varies	Pre-paid shipping boxes provided by vendor	NA	Boxes in Assembly/Shipping building	McMaster-Carr Supply Company Chicago IL Recycled

PROCESS DESCRIPTION



Maca Plastics has operated at 3455 Cross Road, Winchester, Ohio since 1992. The company employs about 75 people and operates 3 shifts per day. The company manufactures interior automotive components for the automotive industry, as well as consumer goods such as bird feeders.

Polypropylene resin pellets are used in an injection molding process to produce parts in the Manufacturing building. In the Warehouse/Shipping/Assembly building, parts are assembled into finished products, packed, and stored until shipped. This area also serves as a warehouse for raw materials until they are used in the manufacturing process.

IMAGE SOURCE: www.macaplastics.com

WASTE MANAGEMENT INFORMATION

Used oil wastes (hydraulic oil, mineral oil) are generated from the injection molding machines. A 10% propylene glycol/water mixture, used to release the plastic from the metal molds, is generated from the Chiller Unit and is also managed as a used oil waste. Spent parts cleaner (petroleum naphtha) is generated from cleaning metal molds and parts. These wastes have been determined non-hazardous and are collected and sent off-site for recycling/reclamation/reuse. Spent fluorescent lamps are managed as universal waste and sent off-site yearly for recycling/reclamation.

REGULATORY HISTORY

Maca Plastics has not previously been inspected for compliance with Ohio's hazardous waste regulations.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No NA

UNIVERSAL WASTE LAMPS

WASTE MANAGEMENT - LABELING/MARKING

8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

NOTE: Accumulation is defined as date generated or date received from another handler.

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
 - a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
 - a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
 - b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
 - c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA
 - d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA

- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No NA

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No NA
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes No NA
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes No NA
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA' s "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)] Yes No NA
- c. Is a copy of U.S. EPA' s "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No NA

