

Environmental  
Protection Agency

Governor  
Lt. Governor  
Director

October 13, 2011

RE: RPI OF INDIANA, INC.  
CONDITIONALLY EXEMPT SMALL  
QUANTITY GENERATOR  
OHD 987 023 496  
HOLMES COUNTY  
NOV

Mr. Michael McVicker  
RPI of Indiana, Inc.  
8339 C.R. 245  
P.O. Box 38  
Holmesville, Ohio 44663

Dear Mr. McVicker:

Please thank Gary West and Renee Sipes for accompanying me during Ohio EPA's September 27 and 30, 2011 inspection of RPI of Indiana, Inc. (RPI) in Holmesville, Ohio. I inspected RPI to determine its 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). My inspection included a review of company operations and written documentation. In addition to the inspection for compliance with Ohio's hazardous waste rules, the facility was inspected for compliance with Ohio's universal hazardous waste rules.

RPI is a manufacturer of steel dumpsters and donation boxes. Operations include cutting, bending and welding of sheet steel to form the boxes. Once assembled, the boxes are painted in the facility paint booth. The facility currently generates one hazardous waste stream, waste paint (D001) from the paint booth area. The majority of the "excess" paint is currently blended with primer and used to prime the boxes. Only small amounts of waste paint are being accumulated in a 55 gallon container for disposal as hazardous waste. The facility's rate of generation makes RPI a conditionally exempt small quantity generator of hazardous waste.

The following violation of Ohio's hazardous waste rules was found during this inspection. In order to correct this violation you must do the following and send me the required information **within 30 days** of the date of this letter:

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

Any person who generates a waste must evaluate the waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51. RPI violated this regulation by disposing of waste lamps (primarily fluorescent lamps) as solid waste without determining whether or not the waste

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lamps are a hazardous waste. The waste fluorescent lamps contain mercury and may contain other hazardous metals. These may therefore be a hazardous waste. To abate this violation, submit documentation of RPI's evaluation of the waste lamps in compliance with Ohio's hazardous waste regulations.

**As an alternative to determining whether your particular waste lamps are hazardous waste, you may wish to manage them as Universal Waste.** In general, this would involve saving the waste lamps in a properly labeled and closed container and having them recycled by a lamp recycler. If RPI chooses to manage the waste lamps as Universal Waste and recycle the lamps through an approved lamp recycler, indicate this in your response letter.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (330) 963-1231. You can find copies of the rules and other information on the Division of Materials and Waste Management's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,  


Tom Roth  
District Representative  
Division of Materials and Waste Management

TR/cl  
Enclosure

ec: Jeff Mayhugh, DMWM, CO  
Niall McKenna, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO

cc: Marlene Kinney, DMWM, NEDO

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
*NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.*

Safety Equipment Used:

**WASTE EVALUATION**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**GENERATOR CLASSIFICATION**

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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*NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

**OFF-SITE SHIPMENT OF HAZARDOUS WASTE**

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**TREATMENT OF HAZARDOUS WASTE**

4.	Does the generator treat hazardous waste in a:	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: Complete appropriate checklist for each unit.*

*NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.*

*NOTE: If waste is treated to meet LDRs, use LDR checklist.*

**MIX HAZARDOUS WASTE WITH USED OIL**

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>