



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

FILE COPY

November 1, 2011

Mr. Carl Drury
Ohio Valley Outdoors
2805 Columbus-Lancaster Rd.
Lancaster, Ohio 43130

Re: **CDO Complaint #4160**
OHR000134080 Fairfield County (CESQG)

Dear Mr. Drury:

Thanks for your time and assistance during my visit to Ohio Valley Outdoors, in Lancaster on October 12 and 17, 2011. The purpose of my visit was to investigate a complaint that Ohio EPA had received alleging problems with the handling of potential hazardous wastes at your facility. Ohio's laws under Chapter 3745 of the Ohio Administrative Code and Chapter 3734 of the Ohio Revised Code establish a system for safe and responsible management of hazardous wastes. This letter summarizes our findings.

One violation was noted:

Waste Evaluation, OAC rule 3745-52-11: Potential hazardous wastes must be evaluated according to the requirements of this section, prior to disposal.

Floor sweepings from the range areas had not been tested by TCLP for possible lead content, for evaluation as possible D008 hazardous waste. Until the time of our visit, this material had been disposed to the solid waste dumpster. The shooting range was known to be a lead environment, so this testing is considered appropriate.

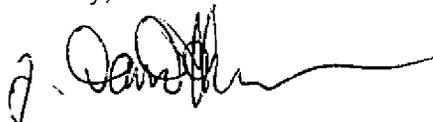
Waste fluorescent lamp tubes and HID bulbs from the facility had also been disposed of as solid waste without being evaluated for possible hazardous characteristics. They commonly contain mercury and/or lead.

- ☞ *Samples of floor sweepings collected for testing by Advanced Analytical Laboratories on October 17, 2011 were reported on October 31, 2011 to exceed the leachable lead threshold to be D008 hazardous waste. This waste must be accumulated and managed as such. Ohio Valley Outdoors also needs to manage waste lamps (bulbs and tubes) according to universal waste requirements-- see enclosed guidance.*

Mr. Carl Drury
Ohio Valley Outdoors
Page -2-

A response from you is needed within 14 days describing actions being taken to return to compliance. If you have any questions, do not hesitate to contact me by phone at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Materials and Waste Management
Central District Office

c: CDO File

JDH/nsm OVO NOV

"Notice: Ohio EPA's failure to list specific deficiencies/violations in this letter does not relieve your company from having to comply with all applicable regulations."

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)] <i>RMK: Yes, of those which have been properly evaluated and determined to be hazardous waste.</i>	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"/>

HAZARDOUS WASTE MIXING WITH USED OIL

RMK: N/A No used oil was being generated, and no hazardous wastes were being mixed with used oil for any purpose.

PROCESS, WASTE, P2 SUMMARY SHEET

Ohio Valley Outdoors, Inc. CESQG Inspected on: 10/12 and 10/17/2011 ID#: unassigned

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	Average quantity generated per Month, Type of Accumulation (container, tank, etc) & location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1 Maintenance of ventilation system filters	Spent pleated air filters (D008)	Approximately 40 lbs.	n/a	Envirite, a/k/a Michigan Disposal Waste Treatment Plant (Belleville, MI)	n/a	Filters are inspected by trained personnel and only changed as necessary
2 Range Backstop	Spent bullets Scrap metal-with lead and brass	Estimated 60 lbs./week	n/a	Recycled as scrap metal to a Columbus area dealer	n/a	None noted
3 Floor sweeping in the shooting range	Shell casings (scrap metal)	5-10 lbs./week	n/a	At the time of our inspection, these had been typically disposed to the solid waste dumpster.	n/a.	Carefully separate all shell casings (for scrap metal recycling) and large paper/plastic target fragments (uncontaminated) from the sweepings in order to reduce volume and weight of the portion which may contain hazardous lead.
	Large Target fragment debris (plastic and paper)	2 lbs./week				
	Fine debris and dust (includes powder, paper and possible lead) NEEDED EVALUATION BY TCLP TESTING	10 lbs./week				

REMARKS & GENERAL INFO See narrative report for details. Additional P2 remarks and info: Would this facility be interested in a P2 assessment? *If yes, refer promptly to OCAPP., 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.h

Hohmann, David

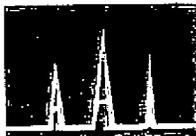
From: advan1@choiceonemail.com
Sent: Monday, October 31, 2011 10:00 AM
To: Hohmann, David
Cc: Sheldon, Randy
Subject: TCLP Pb Results for Ohio Valley Outdoors
Attachments: 1110047 ohio valley outdoors qc report.pdf; 1110047 Ohio Valley Outdoors Case Narrative.pdf

Gentlemen,

Attached is your analytical results, QA/QC results, and case narrative for the listed project. The copies of the bench sheets will be included with the hard copy mailed to you and the client. Let us know if you have any questions. Thank you.

Sincerely,
Eve Karnitis
Advanced Analytics Laboratories, Inc.

Please note: Reports sent via email will not include a signature.
The hard copy that you will receive in the mail will be signed.



ADVANCED ANALYTICS LABORATORIES, INC.

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

October 28, 2011

Carl Drury
Ohio Valley Outdoors
2805 Columbus-Lancaster Road
Lancaster, OH 43130

Re: TCLP Lead Testing

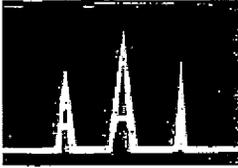
The following report contains the analytical results for the sample submitted to Advanced Analytics Laboratories, Inc. (AALI) on October 17, 2011. The sample was received according to documented sample acceptance procedures and was analyzed in accordance with Ohio EPA protocols.

AALI attests to the validity of the laboratory data generated and reported herein.

All analyses were performed using OEPA approved methods. The data has been reviewed for compliance with the laboratory's QA/QC requirements. The analytical results in this report were compliant with AALI's QA/QC program.

Sincerely,

L. Eve Karnitis
President



ADVANCED ANALYTICS LABORATORIES, INC.

1025 CONCORD AVENUE

COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

26 October 2011

Carl Drury

Ohio Valley Outdoors

2805 Columbus-Lancaster Rd.

Lancaster, OH 43130

RE: TCLP Pb Testing

Enclosed are the results of inorganic analyses for samples received by the laboratory on 10/17/11 12:50.

The sample was extracted by EPA method 1311. Advanced Analytics Laboratories attests that all analytical methods were performed using acceptable methods and that the QA/QC procedures stipulated in these methods were followed.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

L. Eve Karnitis
President



ADVANCED ANALYTICS LABORATORIES, INC.

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COLUMBUS, OHIO 43212

(614) 299-9922 FAX (614) 299-4002

Analysis & Testing - Quality Control Programs - Research & Development

Ohio Valley Outdoors
2805 Columbus-Lancaster Rd.
Lancaster OH, 43130

Date Reported: 10/26/11

Project: TCLP Pb Testing
P.O. Number: [none]
Project Manager: Carl Drury

ANALYTICAL REPORT FOR SAMPLES

Client Sample ID	AALI Sample ID	Matrix	Date Sampled	Date Received
#1	1110047-01	Soil	10/17/11	10/17/11



ADVANCED ANALYTICS LABORATORIES, INC.
1025 CONCORD AVENUE
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Analysis & Testing - Quality Control Programs - Research & Development

Ohio Valley Outdoors
2805 Columbus-Lancaster Rd.
Lancaster OH, 43130

Date Reported: 10/26/11

Project: TCLP Pb Testing
P.O. Number: [none]
Project Manager: Carl Drury

ANALYTICAL RESULTS

Client Sample I.D.: #1

Date Collected: 10/17/11

AAI Sample I.D.: 1110047-01 (Soil)

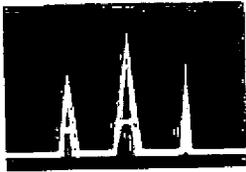
Date Received: 10/17/11

Analyte	Result	Reporting		Units	Prepared	Analyzed	Method	Notes
		Limit						
TCLP Metals by 6000/7000 Series Methods								
Lead	4160	100		mg/l	10/25/11	10/25/11	EPA 6010A	

Advanced Analytics Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

L. Eve Karmitis, President



ADVANCED ANALYTICS LABORATORIES, INC.
 1025 CONCORD AVENUE
 COLUMBUS, OHIO 43212
 (614) 299-9922 FAX (614) 299-4002
Analysis & Testing · Quality Control Programs · Research & Development

Ohio Valley Outdoors
 2805 Columbus-Lancaster Rd.
 Lancaster OH, 43130

Date Reported: 10/26/11

Project: TCLP Pb Testing
 P.O. Number: [none]
 Project Manager: Carl Drury

TCLP Metals by 6000/7000 Series Methods - Quality Control
Advanced Analytics Laboratories, Inc.

Analyte	Result	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch AJ12505 - EPA Microwave 3015									
Blank (AJ12505-BLK1)			Prepared & Analyzed: 10/25/11						
Lead	ND	0.100							
LCS (AJ12505-BS1)			Prepared & Analyzed: 10/25/11						
Lead	1.04	0.100	1.00		104	80-120			
Matrix Spike (AJ12505-MS1)			Source: 1110050-01		Prepared & Analyzed: 10/25/11				
Lead	0.973	0.100	1.00	0.097	87.7	80-120			
Matrix Spike Dup (AJ12505-MSD1)			Source: 1110050-01		Prepared & Analyzed: 10/25/11				
Lead	1.01	0.100	1.00	0.097	90.9	80-120	3.26	20	

Notes and Definitions

DET Analyte DETECTED
 ND Analyte NOT DETECTED at or above the reporting limit
 RPD Relative Percent Difference

Advanced Analytics Laboratories, Inc.

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L. Eve Karnitis, President