



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

INTER-OFFICE COMMUNICATION

TO: Lucas County, Riehle Manufacturing Company File
FROM: Don North *DAN*
DATE: July 28, 2010
RE: Riehle Manufacturing Company Return to Compliance based on historical work at the site.

On January 13, 2005, I investigated a complaint at the former Riehle Manufacturing Company (RMC) facility located at 5264 Telegraph Road in Toledo, Ohio. The complaint, received by the Ohio EPA on December 16, 2004, alleged that numerous containers of hazardous waste and used oil were being stored at RMC. I observed waste containers (both 55-gallon drums and 5-gallon pails) in the facility's main building and many in the facility's garage. There appeared to be more than fifty (50) 55-gallon drums of waste and twenty (20) 5-gallon pails of waste at the facility. See the file for numerous photos.

According to Mark Riehle, Haulrite of the Midwest, Inc. (HRM) leased the facility from his company and started business on or about May 1, 2002. Mark Riehle reported that HRM manufactured and painted trailers and, in the process, cleaned its spray painting equipment at the facility. Mark Riehle also stated that HRM's trailer painting operations at the facility generated the wastes that I observed during the complaint investigation on January 13, 2005, and that neither Mr. Riehle nor RMC had generated any of the waste.

On January 27, 2005, I was present when Interdyne of Lima, Ohio, moved waste containers from the garage into the welding shop (where HRM containers were located) in the facility's main building. Interdyne segregated the waste containers once they were moved into the main building in order to make future sampling of the containers more efficient. On this day, I observed several containers marked in such a way that indicated they were generated by RMC, not HRM. In addition, because of their location (grouped together in the facility's garage), similar drum type, similar chemical label type and supplier, Ohio EPA believed that many of the waste containers at the facility were generated by RMC, and not just HRM.

As a result of a Compliance Evaluation Inspection (CEI) on January 27, 2005, RMC was found in violation of OAC Rule 3745-52-11. A Notice of Violation (NOV) letter was sent to the facility on March 1, 2005. RMC was required to prepare a sampling and analysis plan for the containers of unknown waste.

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On March 23, 2005, I received a copy of the Drum Screening Plan from Interdyne. On March 24, 2005, I received a copy of the Sampling and Analysis Plan from Interdyne. On March 25, 2005, Ohio EPA provided Interdyne with comments on the Drum Screening Plan.

On April 13, 2005, I received a revised copy of the Drum Screening Plan, the Sampling and Analysis Plan, the new Health and Safety Plan and the new QA/QC Plan from Interdyne. Ohio EPA provided comments to Interdyne in writing and by phone, regarding the plans, on numerous occasions. On April 20, 2005, RMC responded in writing to Ohio EPA's March 1, 2005, NOV. Ohio EPA developed its own Sampling and Analysis Plan, dated May 18, 2005, and Health & Safety Plan, dated May 19, 2005.

Interdyne's plans were accepted and screening was performed on May 23, 2005. A total of 154 containers were screened by Ohio EPA, since Interdyne did not have the skills to do the work themselves. Sampling of the containers was performed by Ohio EPA on May 24, 2005. Interdyne obtained 29 samples for RMC and Ohio EPA split 10 samples. Ohio EPA performed the sampling. The analytical results from Ohio EPA's contract laboratory were received on July 11, 2005. Based on the sampling, many of the containers were found to be oil or oily water. Other containers held non-hazardous wastes. However, the results identified at least the characteristics D001, F003, F005 and D008 for the waste in some of the drums. The exact number of containers of hazardous waste can be found in the record in the file. Interdyne's analytical results were provided by email in June of 2005 and by US mail on October 7, 2005.

Next, Interdyne submitted a Waste Disposal & Site Cleanup Plan and Ohio EPA commented on it and required revisions to it. On July 26, 2005, all the waste was removed from the site. On July 27, 2005, Interdyne reported that the spots on the weld shop floor were thoroughly cleaned and resulted in one drum of wash water. This drum was sent off-site for disposal on August 9, 2005. Mr. Ali Moazed, DHWM, NWDO, observed the cleaning operations. On September 28, 2005, Interdyne submitted the final report for sampling, analysis, disposal and cleanup at the site. This final report includes hazardous waste manifests and non-hazardous waste shipping papers documenting the off-site shipment and management of the wastes found at the facility.

Therefore, based on Ohio EPA's observations, photos, container screening, sampling and analysis (as well as the analysis of Alloway Environmental Testing Service on behalf of Interdyne and Riehle Manufacturing) and the manifests provided to Ohio EPA, Riehle Manufacturing Company had demonstrated that it abated its violation of OAC Rule 3745-52-11 on September 28, 2005.

/lb

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM-NWDO, Riehle Manufacturing, File, Lucas County~~

ec: Don North, DHWM, NWDO