Eval. 002
Enf. 001
RTC'd 1 violation

Ohio | Environmental Protection Agency

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

February 6, 2012

Ms. Wendy Wray, Treasurer/Operations Manager
H&W Screw Products, Inc.
335 Industrial Drive
Franklin OH 45005

RE: NOV/RTC H&W Screw Products, Inc. CESQG OHD091823682

Dear Ms. Wray:

On January 31, 2012 I inspected H&W Screw Products, Inc. The purpose of the inspection was to determine your 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). As is our standard practice, I did not schedule my inspection in advance. You and Kevin represented H&W.

My inspection began with an introductory meeting and a review of the MSDSs for several raw materials. After my physical inspection, we finished with a summary of my preliminary conclusions.

I found the following violation of the Ohio hazardous waste rules:

Used oil containers and tanks must be labeled with the words "Used Oil": OAC 3745-279-22(C)(1) requires that tanks and containers used to manage used oil be marked with the words "used oil". The rules do not allow alternate wording. The three totes stored behind you plant were not marked.

☞ On February 2 you provided me by e-mail, photos of the totes properly marked with the required wording. No further actions are required by you to be returned to compliance.

Conditionally Exempt Small-Quantity Generator (CESQG) Status

Ohio EPA records show that H&W first notified USEPA of waste activity in 1986. At that time you were issued the generator ID number that appears in the heading of this letter. The ID number is address-specific and it is still a valid generator ID number. However, I determined that you are actually operating as a CESQG which basically means you generate less than 220 pounds of hazardous waste per calendar month. As a CESQG, you are not required to use your ID number on the shipping papers for

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transporting used oil. You are properly managing all your wastes under the used oil regulations and you should continue to do so.

CESQGs are still subject to the universal waste rules; specifically those rules which regulate the disposal of universal waste lamps. Stated most simply, you must properly store and label burned out fluorescent tubes and you should ship them to only a facility that has properly notified Ohio EPA of universal waste activities. You are not permitted to dispose of your waste lamps in the trash.

Please contact me at (937) 285-6090 if you have any questions or if I can assist you in any way.

Sincerely,

Tom Ontko
Hazardous Waste Inspector
Southwest District Office

TO/tf

Enclosures: Universal Waste Rules for Handlers of Lamps
Ohio CESQG Rules from "The small business resource"
Process description summary
CESQG checklist
Used oil checklist

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.

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
GENERATOR CLASSIFICATION			
2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]		Yes
*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
TREATMENT OF HAZARDOUS WASTE			
4.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	No
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	No
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	No
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	No
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
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes

See process summary for a discussion of the commingling of the parts washer sludge with the used oily waste water.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: H&W **Facility Type:** ☐LQG ☐SQG ☒CESQG ☐TSD **Date of Inspection:** 1/31/12 **EPA ID#:** OHD091823682

	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.**	**QTY Generated per Month, Type of** Accumulation (container, tank, etc) and 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	cleaning floors	oily water	stored in totes behind plant		WWT-		
2	parts cleaning	pourable sludge	same		WWT		
3	de-burring metal parts in a tumbler	oill sludge	same		WWT		
4	floor cleaning	oily soapy water water	same		WWT		
5							
6							
7							
8							
9							

REMARKSBGENERAL INFORMATION

General Process Information:
H & W Screw Products, Inc.manufactures small parts from a variety of feedstocks. A fabricating machine, a CNC machine and lathes, etc all use coolants/cutting oils. Feedstocks are typically 12 foot bars of cold-rolled steel, brass, aluminum,and several grades of stainless steel. A parts tumbler is used for deburring metal parts and a parts washer is used to clean parts as the last step before shipping.
Floors are washed regularly for safety reasons. H&W states they do not discharge floor washing water to the sanitary sewer-the mop buckets are emptied to the totes as described below.
All the wastes from the above process are commingled in 3 totes (roughly 2-300 gallons each). The totes actually meet the definition of tanks in that they are typically not moved. Thety are free-standing outside the building and the totes are able to be visually inspected for leaks from all sides. The wastes from all the processes are being appropriatley managed under the used oil standards.
The parts washer uses a low flash solvent (Ashland Mineral Spirits 66). There is no analytical data on the parts washer sludge but it is possible that this may flash when the waste leaves the washer. As CESQGs are allowed to mix a characteristic waste with used oil as long as the used oil is appropriately managed as such, I consider the absence of analytical data to be moot. I did review results for the latest sample of the commingled used oil. The sample did not exhibit the ignitable characteristic.
United Waste Water pumps the totes and transports the combined waste water for treatment. They have properly notified Ohio EPA as a used oil transporter and processor, (OHO000107649)

Regulatory/Enforcement History (if applicable)**:**
CESQG-no previous compliance inspections noted in RCRAInfo

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? ☐ Yes* ☐ No *If yes, refer promptly to your district P2 coordinator.
Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. 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.
2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		No
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	N/A
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		N/A
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		No
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, **remark-Residuals form a parts tumbler, a parts washer and floor cleaning are all mixed and managed as used oil. The parts washer uses Mineral Spirits 66 which as a raw product flashes below 140F and it would be a characteristic (D001). No analytical results are available for the raw waste as it is removed from the washer. That question is moot as CESQG are allowed to mix used oil with hazardous waste.**		Yes
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes
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)]		N/A
Halogenated solvents are not used in any processes.			
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)]		No
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]		Yes
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] H&W manages oily waste water in three totes located behind the building. The totes did not		No
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		N/A
	a.	Stopped the release?	N/A
	b.	Contained the release?	N/A
	c.	Cleaned up and properly managed the used oil and other materials?	N/A
	d.	Repaired or replaced the containers or tanks prior to returning them to	N/A

		service, if necessary?	
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		No
	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?	N/A
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	N/A
	c.	Are the combustion gases from heater vented to the ambient air?	N/A
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		No
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	N/A
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	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			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		N/A
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		N/A
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		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.			

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