



Environmental
Protection Agency

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

Eval. 002

Enf. 002

RTC'd 1 violation

March 21, 2012

Quality Forms
Mr. Thomas Kinnison
4317 West US Route 36
Piqua, OH 45356

RE: NOV/RTC - QUALITY FORMS, OHD004268447

Dear Mr. Kinnison:

On March 14, 2012, I conducted an inspection of Quality Forms. 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). You and Brian represented Quality Forms. After I explained the purpose of the inspection, you described your processes. My physical inspection included the various printing lines, outside chemical storage area, alcohol still in the bond paper warehouse, used fluorescent lamp storage on the mezzanine in the working warehouse and the camera area.

I determined that Quality Forms is acting as a non-generator of hazardous waste. The U.S. EPA generator identification number was obtained many years ago and is still considered valid. Please contact me if you would like to inactivate this number. See the attached Process Description Summary for my determination of how the hazardous waste rules apply to your processes.

I found the following violation of Ohio's used oil rules:

Labeling Used Oil Containers:

OAC 3745-279-22(C)(1) requires generators to manage used oil in containers that are clearly marked with the words "used oil". The rule does not allow alternate wording.

☞ March 19, 2012, you emailed me an electronic file of your new labels. No further action is required by you to be returned to compliance.

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I have enclosed a Process Summary Sheet, a Used Oil Checklist and a Universal Waste Checklist. Please contact me at (937) 285-6090 if you have any questions or if I can assist you in any way in understanding and following the rules of Ohio EPA.

Sincerely,



Tom Ontko
Hazardous Waste Inspector
Southwest District Office

TO/tf

Enclosures

cc: file

ec: Robyn Fox
George Strobel

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.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:		Facility Type: non-generator		Date of Inspection:		EPA ID #:	
Quality Forms				3/14/2012		OHD004268447	
Waste Generated				On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>		Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	distilling alcohol spent	still bottoms, non-characteristic	1 or 2 lbs. per five gallon batch		discarded as solid waste		
2	distilling alcohol spent	recovered solvent	~4 gallons/batch		re-used in processes		
3	cleaning printing equipment	dirty rags wetted w/ mineral spirits			laundered at commercial laundry and re-used		
4	parts washer	dirty mineral spirits, low flash			Heritage Crystal Clean re-use program not manifested as a waste		
5	cleaning printing equipment	dirty mineral spirits, low flash			Heritage Crystal Clean re-use program not manifested as a waste		

6	developing photographic negatives	recovery of silver from developing solutions		WWT treatment system of 2 CPAC filters ganged in series	silver is reclaimed off-site		
7	unnneeded photographic negatives used to make printing plates	negatives from outdated forms			precious metal recovery at Silver Solutions, Cincinnati		
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

Quality Forms (QF) prints business forms by the off-set printing process. If a customer need forms printed on colored paper, QF tints white paper. Generally, off-set printing involves the transfer of ink from a metal plate which bears the desired image to a rubber roller and finally to the paper form.

Plates were traditionally made by a photographic process which involved transfer of the image from a photographic negative to the metal plate. The traditional plates process includes all the steps employed in developing photographic negatives—wet developing exposed film in a dark room, the various solution-phase developing, fixing and washing steps. QF uses a electrochemical silver recovery process on the developing solutions prior to sewerage the photo solutions.

A newer process called 'computer to print' (CTP) does not involve photographic chemicals—the metal plate is produced digitally. Two types of ink are used—soy-based and quick-drying. The quick-drying inks are solvent-based and are typically low flash and hazardous if discarded. QF manages a solvent still in the bond paper warehouse area to recover ethanol from spent tinter and cleaning solvents. The dirty ethanol is regulated as a characteristic (D001) spent material and must be managed as a hazardous waste. This waste determination is based on the low flash of ethanol—QF does not have analytical data on the dirty solvent. The solvents are managed in containers except when they are actually being distilled. The still bottoms are a dry, powdery solid. By process knowledge the bottoms are not regulated as a characteristic hazardous waste.

QF sends rags used to clean process equipment to a commercial laundry. The rags are wetted with a low flash solvent.

QF manages used oil from presses and hydraulic lines.

Regulatory Interpretation:

QF manages dirty mineral spirits under Heritage Crystal Cleans use/reuse program. Since the mineral spirits are not a waste, they are not subject to the generator requirements.

QF sends silver chemical recovery cartridges (CRC) and exposed photographic negative off-site for precious metal recovery. Under OAC 3745-266-70(B), generators are only subject to notification requirements when they ship waste that from which precious metals are recovered. The hazardous waste generator notification submitted many years ago is considered sufficient.

QF reclaims ethanol in a still. Under OAC 3745-51-06(A)(3)(a) anyone who reclaims industrial alcohol is not subject to generator requirements.

QF manages dirty ethanol and mineral spirits in small containers at the individual work areas. Management of these materials in this way by LQGs would typically be considered to be under the satellite accumulation area rules. However, the reclamation of ethanol is exempt from the generator standards including the container management standards. The mineral spirits are also excluded from the generator standards because the dirty solvent is in the continued use program.

Additional P2 remarks and information:

Silver is recovered on-site from developer solutions.

Photographic negatives are shipped to a third party for recovery of silver.

Soy-based inks have replaced solvents for many jobs.

Other:

	No universal waste mercury equipment was present during the inspection.	
UNIVERSAL WASTE LAMPS		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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
21.	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)]	N/A
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Universal waste lamps are stored in the mezzanine in the working warehouse.	Yes
ACCUMULATION TIME		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes
a.	If not, is 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)]	N/A
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Ship lamps annually.	Yes
EMPLOYEE TRAINING		
25.	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
RESPONSE TO RELEASES		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	N/A
27.	Is the material released characterized? [3745-273-17(B)]	N/A
28.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)] All lamps were intact during the inspection.	N/A
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes
31.	Prior to shipping universal waste off-site, does the originating handler	Yes

	ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	No
	a. If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	N/A
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	N/A
	a. Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	N/A
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	N/A
EXPORTS		
35.	Is waste being sent to a foreign destination? If so:	No
	a. Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	N/A
	b. Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	N/A
	c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	N/A

**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
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	No
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,	No
	a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	N/A

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
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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)]	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)]	No
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	
	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 service, if necessary?	N/A

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	N/a

	generators?	
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	N/A
c.	Are the combustion gases from heater vented to the ambient air?	N/A
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
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-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]	N/A
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	
<i>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).</i>		
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
<i>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.</i>		

QF manages used oil in steel 55-gallon containers in the locked chemical storage area located outside adjacent to the building. The area is roofed but open to the air on the sides. The storage area is equipped with heat/smoke detectors and is bermed. The used oil is generated on-site from hydraulic and process equipment.

