



Environmental
Protection Agency

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

Eval. 001

Enf. 001

April 16, 2012

Mr. Douglas L. Whitling, Controller
Stolle Machinery
2900 Campbell Road
Sidney, OH 45365

RE: NOV/PARTIAL RTC, SQG STOLLE MACHINERY- SIDNEY OHD987048204

Dear Mr. Whitling:

On March 26, 2012 I conducted an inspection of Stolle Machinery-Sidney. The purpose of the inspection was to determine Stolle's 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. Jamie Vogler also participated in the inspection.

We began by discussing your processes and wastes. See the attached "Process Description Summary" for my understanding of your processes. We also discussed pollution prevention activities. The physical inspection included the boom room, the paint booth, the storage areas for used oil and universal waste lamps and the parts washer. I determined that Stolle is acting as a small quantity generator (SQG) of hazardous waste.

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

Information Must be Posted Next to the Telephone: OAC 3745-52-34(D)(5)(b) requires that small quantity generators post the name and telephone number of the emergency coordinator, the location of fire extinguishers, fire alarms (if present) and spill control materials, and the telephone number of the fire department unless you have a direct alarm. Telephone lists are posted by all the phones in your facility, but they do not provide the required information.

To be returned to compliance, create the required signs and post them by all the phones. Be sure the signs provide the required information. Please email me an electronic file of the signs within 30 days of your receipt of this letter.

Containers Used to Manage Hazardous Waste Under SAA Rules Must be Marked to Identify Contents: OAC 3745-52-34(C)(1)(b) requires that containers used to manage hazardous waste under the satellite accumulation area (SAA) rules be marked with the words "hazardous waste" or with other words that identify the contents.

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911

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www.epa.ohio.gov

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You manage four different waste streams in the boom room under SAA rules. None of the drums were marked, but you did properly label the liquid paint waste drum before we left the area.

☞ To be returned to compliance, mark all the drums with descriptive words that are adequate to distinguish the four different waste streams. Since the label "hazardous waste" is not sufficient, you are free to invent any descriptive terms you choose. For example, "waste paint solids", "empty spray paint cans", "kitty litter from paint spills" or "left-over paint", would be considered compliant labels. Please email me photos of the SAA containers within 30 days of your receipt of this letter.

Management of Containers Under the SAA Rules

I am providing you with links that you may find useful in understanding the hazardous waste rules. I provide the following discussion of the satellite accumulation area rules to try to be more specific to your particular situation.

SQGs can manage hazardous waste either under SAA rules or under the standards that apply to containers that are accumulated. The accumulation standards are addressed in the SQG checklist section headed "Use and Management of Containers". Notice that I marked all those items "N/A" in your checklist. I determined that all the drums were more appropriately managed under SAA rules. Note the rules applicable to containers that are accumulated.

Briefly, containers being accumulated; must be labeled with the words "hazardous waste"; must be marked with the date on which they are first accumulated; must be inspected for releases weekly and a record must be kept of the inspections; must be manifested to a permitted hazardous waste facility within 180 days of the date of the date waste is first placed in the drum.

Containers managed under SAA rules are subject to a reduced standard. An SAA drum is not considered to be accumulated until it is full. You may continue to add waste to a partly filled SAA drum for an indefinite period of time. The major limitation of SAA rules is volume. You may only manage a maximum of 55 gallons of any given waste stream under SAA rules. The following scenario illustrates the rules:

A painter adds some waste liquid paint to the appropriate drum in the boom room. Before he is finished, he realizes that the drum is full. He removes the funnel, closes the drum and writes today's date on a hazardous waste label which he affixes to the full drum. He obtains a new empty drum, marks the drum with the words "waste liquid paint" as he was trained to do, attaches the funnel, finishes emptying his safety can, and closes the lid on the funnel. This full drum is now being accumulated and is subject to the management standards previously described. Specifically, the drum must be manifested to a permitted facility within 180 days.

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By now you have realized that one important distinction between drums being accumulated and SAA drums is when the 180 day calendar begins. For drums being accumulated, the clock starts when waste is first placed in the drum. For SAA drums, the clock starts when the drum is full.

I have enclosed a process summary sheet, a used oil checklist, a universal waste checklist and a SQG 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

TO/ff

Enclosures

ec: George Strobel, Robyn Winstead

cc: file

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.

**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)]	No
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	N/A

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)]	Yes
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 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-transported 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]	N/A
<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>		

**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: safety glasses

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes
2.	Has the generator obtained a U.S. EPA I.D. number? [3745-52-12]	Yes
3.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)]	No
4.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)]	No
5.	Does the generator accumulate hazardous waste?	Yes

NOTE: If the SQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements might still apply, e.g. manifest, marking, LDR, etc.

6.	Has the generator accumulated hazardous wastes <u>in excess of</u> (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)]	No
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NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

7.	Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)]	No
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NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

8.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	N/A
	b. Tank that meets 3745-66-101?	N/A
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	N/A
	d. Containment building that meets 3745-256-100 to 3745-256-102?	N/A

Stolle does not treat hazardous waste.

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

MANIFEST REQUIREMENTS

9.	Are all hazardous wastes either reclaimed under a contractual agreement as defined in OAC rule 3745-52-20(E), or shipped off-site accompanied by a manifest (U.S. EPA Form 8700-22)? [3745-52-20(A)(1)]	Yes
10.	Are wastes reclaimed under a contractual agreement? If so: [3745-52-0(E)]	No
	a. Does the contractual agreement specify the type of waste and frequency of shipment?	N/A
	b. Is the transport vehicle owned and operated by the reclaimer?	N/A
	c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement?	N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

11.	Have items 1 through 20 of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes
<i>NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [3745-52-20(A)(1)]</i>		
12.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes
<i>NOTE: The generator may designate on the manifest one alternative facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]</i>		
13.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	N/A
14.	Have the manifests been signed by the generator and initial transporter? [3745-52-23 (A) (1) and (2)]	Yes
<i>NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.</i>		
15.	If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? [3745-52-42(B)]	N/A
16.	Are signed copies of all manifests being retained for at least three years? [3745-52-40]	Yes
<i>NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.</i>		
PREPAREDNESS AND PREVENTION		
17.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)]	Yes
18.	Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]	
	a. Name and telephone number of emergency coordinator?	No
	b. Location of fire and spill control equipment, and, if present, fire alarm(s)?	No
	c. Telephone number of local fire department?	No
19.	Are employees familiar with waste handling and emergency procedures? [3745-52-34(D)(5)(c)]	Yes
20.	Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)]	N/A
21.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste? [3745-65-31]	Yes
22.	Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:	
	a. Internal Alarm system? [3745-65-32(A)]	Yes
	b. Emergency communication device? [3745-65-32(B)]	Yes
	c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]?	Yes
	d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes
23.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes

	a.	Are inspections recorded in a log or summary? [3745-65-33]	Yes
24.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (<i>unless the device is not required under OAC 3745-65-32</i>)? [3745-65-34(A)]	Yes
25.		If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance (<i>unless not required under OAC 3745-65-32</i>)? [3745-65-34(B)]	N/A
26.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes
27.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes
28.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	N/A
SATELLITE ACCUMULATION AREA REQUIREMENTS			
29.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	N/A
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes
	f.	Containers are marked with the words "Hazardous Waste" <u>or</u> other words identifying the contents? [3745-52-34(C)(1)(b)]	No
30.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	No
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	N/A
	b.	Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	N/A
<p><i>NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.</i></p>			
USE AND MANAGEMENT OF CONTAINERS			
31.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(D)(4)]	N/A
32.		Is the accumulation date on each container? [3745-52-34(D)(4)]	N/A
33.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	N/A
	b.	In good condition? [3745-66-71]	N/A
	c.	Compatible with wastes stored in them? [3745-66-72]	N/A
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	N/A

34.	Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days.	N/A
	a. Are inspections recorded in a log or summary? [3745-66-74]	N/A
35.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	N/A
36.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	N/A
37.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	N/A
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.		
PRE-TRANSPORT REQUIREMENTS		
38.	Does each generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes
39.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes
40.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes

Remark item # 10 Low flash parts washer solvents are in a continued use program, and are not being reclaimed.

Remark item # 18 Stolle posts identical phone lists at all the telephones. The lists do not explicitly state the name of the emergency coordinator, the locations of fire extinguishers or emergency equipment. Cited as a violation.

Remarks-Preparedness and prevention- Fire extinguishers and alarms are located a various places in the facility.

Remarks-Satellite accumulation area- Stolle manages 4 distinct hazardous wastes (aerosol cans and the 3 types of paint wastes described in the "process description summary") in the 'boom room'. During the inspection there were partially-filled 55- gallon drums of all 4 wastes. I have determined that it is appropriate to manage these drums under the reduced SAA requirements taking the following into consideration:

The operator is considered to be the painter. Stolle has only one paint line (most parts are painted at the originating vendors' facility). The boom room is used almost exclusively by the painter as the primary material stored there are paints and solvents. The only other frequent users would be discarding empty aerosol cans of touch-up paint. I conclude that the wastes are under the control of the operator. The liquid paint drum was equipped with a funnel that screws into the bung hole. The cover has a flapper lid that covers the funnel opening but the lid closes under only its own weight-there is no spring or latch. In this case I consider the drum to be properly closed considering that the boom room is only large enough for a manually operated drum dolly-there is no fork truck or any other traffic which could potentially tip the drum over.

Remarks- Use and management of containers-At the time of the inspection, there were no containers of waste being accumulated; all drums with wastes were managed under the SAA rules.

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name:		Facility Type: SQG		Date of Inspection:		EPA ID #:	
Stolle Machinery-Sidney				March 26, 2012		OHD987048204	
<i>Waste Generated</i>				<i>On- or Off-Site Management</i>		<i>P2 Activities</i>	
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	painting	pourable paint waste liquids D001	boom room		Heritage Crystal Clean		
2	cleaning small/routine paint spills	liquid paint soaked onto an inert absorbent D001	boom room				
3	painting	paint solids-stirrers, rollers, brushes D001	boom room				
4	touch up painting of finishes marred	intact aerosol cans D001	boom room	none-cans are not punctured or crushed			
5		red shop rags			laundered and re-used at Cintas		

6	oil drained from finished/tested equipment before shipping	press oil	container storage in non-hazardous area outside 'boom room'		Heritage Crystal Clean		
7	universal waste lamps				Heritage Crystal Clean		
8	parts cleaner	dirty solvent			continued use by Heritage crystal Clean		
9							

REMARKS-GENERAL INFORMATION

General Process Information: Stolle Sidney (2900 Campbell Road) is a division of Stolle Machinery Co. They notified USEPA of hazardous waste activity in January, 2004 using the name Stolle Machinery-Sidney. Stolle Machinery is not affiliated with the following companies that also have the term Stolle in their name in the Sidney Ohio area. Stolle Precision Tool OHD 023894421 is apparently no longer operating. This address was inspected in the late 1990s. Stolle Corp Wiebe Plant located on 2640 Campbell has a generator ID #. Stolle Corp on Campbell and Van de Mark has a hazardous waste transporter number.

This facility for the most part assembles components manufactured elsewhere. None of the machining, grinding, lathing, electroplating, etc. operations usually associated with machine shops occurs here. Stolle's products are large machinery used to fabricate the cans used for packaging food. The machines are tested in-house and shipped dry of lubricants and hydraulic fluids. The oil is subsequently drained and then managed as used oil. Limited spray painting occurs in one spray booth. Most parts are pre-painted by the supplier. Other items are touched up using aerosol cans. Stolle manages 'empty', intact (cans are not crushed or punctured) aerosol cans as D001 hazardous waste. The empty cans are

managed in steel fifty-five gallon drums in the 'boom room.'

The 'boom room' is used for the storage of flammable raw materials (mostly paint). The 'boom room' is an enclosed room w/ an automatically closing fire door. It is located so that one wall is an exterior wall designed to blow outward in an explosion. It is equipped with sprinklers, alarms, fire extinguishers, a 'berm' at the door threshold to limit the spread of spills and a fire door.

The facility generates three distinct paint waste streams-1) pourable liquid paint; 2) liquid paint spills soaked into an absorbent; 3) paint solids including stirrers, rollers, brushes, etc. All four wastes described above are managed in the boom room under the satellite accumulation area (SAA) rules.

Regulatory/Enforcement History (if applicable):

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

Links e-mailed to Doug Whitling on April 10, 2012

This links to our website. Most of the things I mention below are on this page somewhere.

<http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/dmwm>

This links to generator requirements

<http://www.epa.ohio.gov/Default.aspx?tabid=3921>

This table is very good. It details the reduced requirements for SQGs vs. LQGs. Notice that the table also cites the OAC section. The checklists enclosed w/ my letter also refer to the OAC.

<http://www.epa.ohio.gov/portals/32/pdf/GeneratorRequirementsTable.pdf>

This links to the hazardous waste "Notifier" which was a quarterly newsletter. Good stuff, designed to be understandable and relevant, but you will have to do some digging to find what you want.

<http://www.epa.ohio.gov/dhwm/newsletter.aspx>

This links to our "Generator Handbook". This is pretty inclusive but enormous.

http://www.epa.ohio.gov/portals/32/pdf/gen_handbook.pdf