

**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott L. Walby, **Director**

Re: Allied Moulded Products, Inc.  
Plant #1  
Williams County  
OHR000153320  
Hazardous Waste  
**Return to Compliance**

March 6, 2012

Mr. Ron Clark, Safety & Environmental Coordinator  
Allied Moulded Products, Inc.  
222 North Union Street  
Bryan, Ohio 43506

Dear Mr. Clark:

Thank you for your February 16, 2012, response to Ohio EPA's February 13, 2012, Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. Ohio EPA also made a site visit on February 29, 2012, and Allied Moulded Products, Inc. (AMPI) provided additional information. AMPI submitted photographic documentation for the used oil totes, and provided universal waste management documentation. My review of the documentation provided reveals that AMPI has adequately demonstrated abatement of all of the violations cited in the February 13, 2012, NOV/PRTC letter.

The following is a summary of the violations cited in the February 13, 2012, NOV/PRTC letter as a result of my January 25, 2012, inspection and your compliance with respect to each:

**1. OAC Rule 3745-279-22(C)(1): Labeling:**

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

AMPI had six totes of used oil in the water tower room and one tote of used oil in the maintenance area that were not properly labeled.

At the time of my inspection, AMPI properly labeled the one used oil tote located in the maintenance area with the words "used oil". A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to you at the time of my inspection. Please review this information and contact me if you have any questions.

On January 26, 2012, AMPI submitted photographic documentation showing the six used oil totes located in the water tower room now properly labeled with the words "used oil".

***This violation was previously abated on January 26, 2012.***

**2. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:**

All lamps/bulbs being managed as a universal waste must be stored in packages that are structurally sound and adequate to prevent breakage. The packages/containers must be closed.

AMPI did not store the spent universal waste fluorescent lamps in containers that were closed. Specifically, AMPI had one open box of spent mercury vapor bulbs and one open cardboard container of spent fluorescent tube lamps.

On January 26, 2012, AMPI submitted photographic documentation showing the box and container of spent fluorescent bulbs/lamps now properly closed.

*This violation was previously abated on January 26, 2012.*

**3. OAC Rule 3745-273-14(E): Universal Waste: Fluorescent Lamp Labeling:**

All packages and containers holding spent fluorescent lamps/bulbs are to be labeled with the words "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

AMPI did not have the box of spent mercury vapor bulbs properly labeled.

On January 26, 2012, AMPI submitted photographic documentation showing the box of spent mercury vapor bulbs now properly labeled.

*This violation was previously abated on January 26, 2012.*

**4. OAC Rule 3745-273-15(C): Accumulation Time for Universal Waste Batteries and Lamps:**

A small quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

AMPI was unable to demonstrate the length of time the box of mercury vapor universal waste bulbs have been on-site.

**On February 16, 2012, AMPI submitted a copy of the bill of lading for the spent fluorescent lamps that were shipped off-site on February 15, 2012, to Environmental Recycling in Bowling Green, Ohio, where they will be recycled. AMPI will begin dating the universal waste storage containers with the accumulation start date once the first bulb is placed in the new box.**

*With this information, this violation has been abated.*

**5. OAC Rule 3745-273-16: Universal Waste Employee Training:**

A small quantity handler of universal waste shall ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

AMPI has not ensured that all employees are thoroughly familiar with proper universal waste handling and emergency procedures.

**On February 29, 2012, AMPI provided Ohio EPA with documentation regarding the universal waste training that was conducted on February 23, 2012. Ohio EPA reviewed the training video (Universal Waste – bulbs, batts, bugs & barometers) that was purchased by AMPI and the sign-in sheets which documented employee attendance.**

***With this information, this violation has been abated.***

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers  
Division of Hazardous Waste Management

//lr

pc: Cindy Lohrbach, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's 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.

Department: DMWM Subdepartment: DMWM - Hazardous Waste

Program: <NONE>

Office Location: NWDO Medium: LAND

Doc Type: NOV Doc Subtype: <NONE>

Facility County: 69 - PUTNAM Facility ID: OHR000167056

Date: 2/15/2012

Facility/Site/Location/Regulated Entity Name: Meyers Car and Truck Sales Your input is 26 characters long (Max 40).

Facility Address 1: 420 East Washington Street Your input is 26 characters long (Max 40).

Facility Address 2: Your input is 0 characters long (Max 40).

Facility City: Pandora

Facility State: OH Facility ZIP: (00000 or 00000-0000) 45877

Mailing Name: Your input is 0 characters long (Max 40).

Mailing Address 1: Your input is 0 characters long (Max 40).

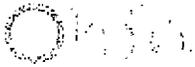
Mailing Address 2: Your input is 0 characters long (Max 40).

Mailing City:

Mailing State/Province: <NONE> Mailing ZIP: (00000 or 00000-0000 or X0X0X0)

Project Name: Project Type:

Latitude: Longitude:



**Environmental  
Protection Agency**

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

Re: Meyer's Car & Truck Sales  
Complaint #3123  
Putnam County  
Notice of Violation/Partial Return to Compliance

February 15, 2012

Mr. Chris Meyer, Owner  
Meyer's Car & Truck Sales  
420 East Washington Street  
Pandora, Ohio 45877

Dear Mr. Meyer:

On January 31, 2012, the Ohio Environmental Protection Agency (Ohio EPA) conducted a complaint investigation at Meyer's Car & Truck Sales (Meyer's) located at 420 E. Washington Street in Pandora, Ohio. The Ohio EPA received a complaint that you were mismanaging used oil. The complainant reported that several 55-gallon drums of used oil are stored behind the building and they are leaking all over the ground. This letter will explain the validity of the complaint and any hazardous waste violations I found as a result of the complaint investigation.

During my visit I spoke with you and observed your operations. Meyer's specializes in mechanical service work. No painting is done on-site. The used oil generated from on-site service work is stored in 55-gallon drums. Meyer's gives the used oil to Northwest Ohio Recycling, Inc., who burns the used oil in an on-site used oil burner. The used oil filters are hot-drained and managed as solid waste. Meyer's may want to consider recycling the used oil filters rather than managing them as a solid waste. A list of used oil filter recyclers was given to you at the time of my investigation.

Used oil generators are required to: store used oil in containers which are in good condition and which are labeled with the words "used oil"; clean up any releases of used oil; transport used oil through registered used oil transporters; and recycle or dispose of the used oil properly. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to you at the time of my investigation. Please review this information and contact me if you have any questions.

At the time of my investigation, Meyer's was not generating any fluorescent bulbs. A copy of Fluorescent Lamps: What You Should Know, was given to you at the time of my investigation. I recommend that you review this document and contact me if you have any questions regarding the proper management of spent fluorescent bulbs when generated.

At the time of my investigation, Meyer's was operating as a non-generator of hazardous waste.

I found the following violations of Ohio's hazardous waste laws.

**1. OAC Rule 3745-279-22(C)(1): Labeling:**

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Meyer's had two 55-gallon drums of used oil outside behind the building and one portable carboy inside the shop that were not properly labeled.

At the time of my investigation, Meyer's properly labeled the two 55-gallon drums and the one carboy with the words "used oil".

***Therefore, this violation is considered abated.***

**2. OAC Rule 3745-279-24, Off-Site Shipment:**

Generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number.

Meyer's has been giving the used oil they generated to Northwest Ohio Recycling, Inc., who is burning it in their on-site burner.

Meyer's must immediately cease giving used oil to any person or transporter who does not have an EPA identification number. To abate this violation, Meyer's must notify Ohio EPA with how you plan to manage your used oil in the future and provide the applicable documentation for review. A list of used oil recyclers was given to you at the time of my investigation.

Enclosed you will find a copy of the checklists that were completed during the complaint investigation.

Ohio EPA will issue an EPA ID number to track our inspection activity. Meyer's cannot use this number for manifesting hazardous waste shipments. If Meyer's wants to use an EPA ID number for manifesting and other hazardous waste, used oil or universal waste activities, you must complete and submit a Notification of Regulated Waste Activity form (*EPA Form 9029 (Rev. 11/2002)*) to Ohio EPA. This form is available on our web page at <http://www.epa.ohio.gov/dhwm/notiform.aspx> or you can call me at (419)373-3066 or the Division of Hazardous Waste Management, Central Office, RIS at (614)644-2977 and we will mail you a copy.

The investigation performed by the Ohio EPA was conducted as a result of a complaint received by this Agency. A Comprehensive Compliance Evaluation Inspection was not conducted. The Ohio EPA did not find evidence to support the complainant's allegations; therefore, the Ohio EPA considers the complaint investigation closed.

Mr. Chris Meyer, Owner  
February 15, 2012  
Page 3

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

At the time of my investigation, Meyer's had scrap tires on-site. OAC Rule 3745-27-60 (B) states, "The storage of scrap tires in any amount outside or inside a trailer, vehicle, or building shall be deemed a nuisance, a hazard to public health or safety or fire hazard..." and Ohio Revised Code 3734.03 states, "No person shall dispose of solid wastes by open burning or open dumping, except as authorized by the director of environmental protection..."

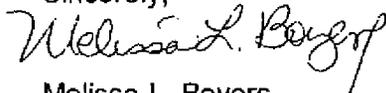
If the owner/ operator wishes to transport more than ten tires at a time, a scrap tire transporter registered with the State of Ohio must be used. Enclosed is a list of registered tire transporters in Ohio. Please note the registered tire transporters are listed by the county their business is located in; they are registered to transport in the entire state of Ohio.

Meyer's needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Meyer's is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [melissa.boyers@epa.ohio.gov](mailto:melissa.boyers@epa.ohio.gov).

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Meyer's is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers  
Division of Materials & Waste Management

Enclosures

pc: Cindy Lohrbach, DMWM, NWDO  
~~Colleen Weaver, DMWM, NWDO~~

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO  
Brent Goetz, DMWM, NWDO

**Notice:**

Ohio's 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.

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b> <b>Site Location Information</b> <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number:		Website: (Optional)	
	Name: <b>Meyer's Car &amp; Truck Sales</b>			
	Street Address: <b>420 E. Washington Street</b>			
	City, Town, or Village: <b>Pandora</b>		State: <b>OH</b>	
County Name: <b>Putnam</b>		Zip Code: <b>45877</b>		
Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>				

<b>Facility Representative</b> Additional names can be recorded in number 12. Only provide address information if it is different than the site address	First Name: <b>Chris</b>		Mi:	Last Name: <b>Meyer</b>	
	Title: <b>Owner</b>				
	Phone Number: <b>419-384-3717</b>			Phone Number Extension:	
	E-Mail Address:				
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:					Date Became Owner (mm/dd/yyyy):					
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box:										
	City, Town or Village:					Owner Phone #:					
	State:					Country:		Zip Code:			
	Name of Site's Operator:					Date Became Operator (mm/dd/yyyy):					
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>		
	Street or P.O. Box:										
	City, Town or Village:					Operator Phone #:					
	State:					Country:		Zip Code:			

**VIOLATIONS CITED?**  Yes  No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))**

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

<input type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit institute that is owned by or has a formal written affiliation agreement with a college or university

**Waste Codes for Federally Regulated Hazardous Wastes:** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s) <b>Melissa Boyers</b>	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) <b>1/31/2012 11:30</b>
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**Comments:**

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Meyer's Car & Truck Sales     
 **Facility Type:** LQG/SQG/CESQG/TSD     
 **EPA ID#:**

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, etc)</small>	Waste Generated <small>(e.g. sludge, spent solvent, ash, etc)</small>	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage <small>(e.g. container, tank, etc)</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Waste Location <small>(Include map if possible)</small>	Name, state, and type of activity occurring at the facility.
1    Lighting	Spent Fluorescent Bulbs					No spent bulbs in storage at the time of the inspection.	Plan to manage as universal waste.  Fact Sheets given to the facility
2    Vehicle Maintenance	Used Oil			55- gallon drums		Outside behind the building	Currently gives used oil to Northwest Ohio Recycling, Inc. in Pandora to use in their on-site used oil burner. Facility given used oil fact sheet and list of recyclers.
3    Vehicle Maintenance	Used Oil Filters						Currently Managed as Solid Waste  Facility encouraged to recycle the used oil filters once drained. Facility given a list of used oil filter recycle
4							

Department:

DMWM

Subdepartment:

DMWM - Hazardous Waste

Program:

<NONE>

Office Location:

NWDO

Medium:

LAND

Doc Type:

NOV

Doc Subtype:

<NONE>

Facility County:

86 - WILLIAMS

Facility ID:

OHD041517020

Date:

2/8/2012

Facility/Site/Location/Regulated Entity Name:

Titan Tire

Your input is 10 characters long (Max 40).

Facility Address 1:

927 South Union Street

Your input is 22 characters long (Max 40).

Facility Address 2:

Your input is 0 characters long (Max 40).

Facility City:

Bryan

Facility State:

OH

Facility ZIP: (00000 or 00000-0000)

43506-2252

Mailing Name:

Your input is 0 characters long (Max 40).

Mailing Address 1:

Your input is 0 characters long (Max 40).

Mailing Address 2:

Your input is 0 characters long (Max 40).

Mailing City:

Mailing State/Province:

<NONE>

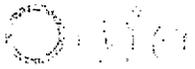
Mailing ZIP: (00000 or 00000-0000 or X0X0X0)

Project Name:

Project Type:

Latitude:

Longitude:



**Environmental  
Protection Agency**

John W. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Wally, **Director**

Re: Titan Tire  
Complaint #3129  
Williams County  
OHD041517020  
Hazardous Waste  
Notice of Violation/Return to Compliance

February 8, 2012

Mr. Tom Jagielski, Operations Manager  
Titan Tire  
927 South Union Street  
Bryan, Ohio 43506-2252

Dear Mr. Jagielski:

On January 25, 2012, the Ohio Environmental Protection Agency (Ohio EPA) conducted a complaint investigation and compliance evaluation inspection of Titan Tire located at 927 South Union Street in Bryan, Ohio. The Ohio EPA received a complaint that you were mislabeling waste oil/used oil and exposing workers to potentially harmful materials.

I inspected Titan Tire to determine its 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). This letter will explain the validity of the complaint, the violations I found as a result of my inspection/complaint investigation, and any follow-up you need to do to correct these violations.

During my visit, I spoke with you and Dave Thomas, inspected your facility operations and reviewed applicable paperwork. Titan Tire manufactures large scale tires for farming, mining and construction equipment.

Used oil is generated as a result of the production equipment gearboxes and is stored in totes and 55-gallon drums. Used oil is picked up once a month for recycling by Cousins. The used oil is burned for energy recovery. The used oil filters are hot-drained and managed as solid waste. Titan Tire may want to consider recycling the used oil filters rather than managing them as a solid waste. A list of used oil filter recyclers was given to you at the time of my inspection/complaint investigation.

Titan Tire has a parts washer (D001) that is serviced quarterly by Crystal Clean. Titan Tire also generates spent fluorescent bulbs and batteries that are managed as universal waste. The universal waste is sent to Waste Management for recycling through their Lamp/Battery Tracker Program. At the time of my inspection/complaint investigation, Titan Tire was operating as a conditionally exempt small quantity generator (CESQG) of hazardous waste.

I found the following violations of Ohio's hazardous waste laws:

**1. OAC Rule 3745-279-22(C)(1): Labeling:**

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

Titan Tire had three 55-gallon drums of used oil that were not properly labeled.

At the time of my inspection/complaint investigation, Titan Tire properly labeled the three 55-gallon drums with the words "used oil".

Used oil generators are required to: store used oil in containers which are in good condition and which are labeled with the words "used oil"; clean up any releases of used oil; transport used oil through registered used oil transporters; and recycle or dispose of the used oil properly. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to you at the time of my inspection/complaint investigation. Please review this information and contact me if you have any questions.

***Therefore, this violation is considered abated.***

**2. OAC Rule 3745-273-13(D)(1): Universal Waste: Fluorescent Lamp Management:**

All lamps/bulbs being managed as a universal waste must be stored in packages that are structurally sound and adequate to prevent breakage. The packages/containers must be closed.

Titan Tire did not store the spent universal waste fluorescent lamps in containers that were closed.

At the time of my inspection/complaint investigation, Titan Tire properly closed the two boxes of spent universal waste fluorescent bulbs.

***Therefore, this violation is considered abated.***

**3. OAC Rule 3745-273-15(C): Accumulation Time for Universal Waste Batteries and Lamps:**

A small quantity handler of universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

Titan Tire was unable to demonstrate the length of time the universal waste bulbs and universal waste batteries have been on-site. Titan Tire was able to demonstrate when the universal waste was last shipped off-site, but was not tracking the date when the accumulation began.

Mr. Tom Jagielski, Operations Manager  
February 8, 2012  
Page 3

At the time of my inspection/complaint investigation, Titan Tire properly labeled the two boxes of spent fluorescent bulbs and the one bucket of spent batteries with the accumulation start date.

***Therefore, this violation is considered abated.***

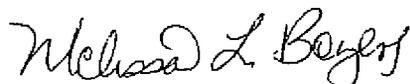
Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Enclosed you will find a copy of the checklists that were completed during the inspection.

In regards to the complaint investigation, the Ohio EPA did not find evidence to support the complainant's allegations; therefore, the Ohio EPA considers the complaint investigation closed.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers  
Division of Hazardous Waste Management

/llr

Enclosures

pc: Cindy Lohrbach, DMWM, NWDO  
~~Colleen Weaver, DMWM, NWDO~~

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's 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.

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b> <b>Site Location Information</b> <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHD041517020</b>		Website: (Optional)					
	Name: <b>Titan Tire</b>							
	Street Address: <b>927 South Union Street</b>							
	City, Town, or Village: <b>Bryan</b>		State: <b>OH</b>					
County Name: <b>Williams</b>		Zip Code: <b>43506-2252</b>						
Private <input checked="" type="checkbox"/>		County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>

<b>Facility Representative</b> Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <b>Tom</b>		MI:	Last Name: <b>Jagielski</b>	
	Title: <b>Operations Manager</b>				
	Phone Number: <b>419-633-4237</b>			Phone Number Extension:	
	E-Mail Address:				
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
State:			Zip Code:		

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator Type:	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box:								
	City, Town or Village:				Operator Phone #:				
	State:				Country:		Zip Code:		

**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

**TYPE OF REGULATED WASTE ACTIVITY (MARK 'X' IN ALL OF THE APPROPRIATE BOXES)**

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))**

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

<input checked="" type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

**Waste Codes for Federally Regulated Hazardous Wastes:** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**D001**

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Melissa Boyers		1/25/2012 10:30

**Comments:**

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Titan Tire

Facility Type: LQG/SQG/CESQG/TSD

EPA ID#: OHD041517020

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
Lighting	Spent Fluorescent Bulbs					U.W. storage area located in the maintenance shop.	Manage as Universal Waste. Waste Management – Lamp Tracker Recycling Program. Last shipment was sent on 9/6/11.
2 Production & Maintenance	Spent batteries					U.W. storage area located in the maintenance shop.	Manage as Universal Waste. Waste Management – Lamp Tracker Recycling Program. Last shipment was sent on 9/6/11.
3 Production Equipment	Used Oil			55-gallon drums and totes		Located in the designated used oil storage area.	Cousins  Used oil is burned for energy recovery.
4 Production Equipment Maintenance	Used Oil Filters						Currently Managed as Solid Waste  Facility encouraged to recycle the used oil filters once drained. Facility given a list of used oil filter recyclers.

5	Parts Washer	Spent Solvent	D001	Approx. 10 gallons	Parts washer unit		Parts washer located in the maintenance shop.	Crystal Clean Fuels Blending
6								
7								
8								
9								
1 0								
1 1								

**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  No  N/A

**GENERATOR CLASSIFICATION**

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes  No  N/A

*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)] Cousins Yes  No  N/A

**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  No  N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes  No  N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes  No  N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes  No  N/A

*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.*

**REMARKS**

**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

*NOTE: 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.*

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are <u>containers</u> , above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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#? Cousins	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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.*

**SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS**

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**

**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

**PROHIBITIONS**

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES**

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] <b>No leaking batteries</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**UNIVERSAL WASTE LAMPS**

8.	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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.**

10.	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)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]  If yes, describe below:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES <span style="float: right;">No releases to date</span>		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] <b>Waste Management-Lamp Tracker</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping?  If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	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> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**EXPORTS**

23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Department: DMWM Subdepartment: DMWM - Hazardous Waste

Program: <NONE>

Office Location: NWDO Medium: LAND

Doc Type: NOV Doc Subtype: <NONE>

Facility County: 87 - WOOD Facility ID: OHD005052154

Date: 2/7/2012

Facility/Site/Location/Regulated Entity Name: Durr Ecoclean Inc. Your input is 18 characters long (Max 40).

Facility Address 1: 1350 Van Camp Road Your input is 18 characters long (Max 40).

Facility Address 2: Your input is 0 characters long (Max 40).

Facility City: Bowling Green

Facility State: OH Facility ZIP: (00000 or 00000-0000) 43402-0859

Mailing Name: Your input is 0 characters long (Max 40).

Mailing Address 1: Your input is 0 characters long (Max 40).

Mailing Address 2: Your input is 0 characters long (Max 40).

Mailing City:

Mailing State/Province: <NONE> Mailing ZIP: (00000 or 00000-0000 or XXXXX)

Project Name: Project Type:

Latitude: Longitude:



**Environmental  
Protection Agency**

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

Re: Dürr Ecoclean, Inc.  
OHD005052154  
Hazardous Waste  
Wood County  
NOV/PRTC

February 7, 2012

Mr. Steve Vollmar, Plant Manager  
Dürr Ecoclean, Inc.  
1350 Van Camp Road  
Bowling Green, Ohio 43402-0859

Dear Mr. Vollmar:

On October 27, 2011, Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Dürr Ecoclean, Inc. (Dürr). On November 17, 2011, Ohio EPA issued a Notice of Violation/Return to Compliance and a request for information letter. Ohio EPA requested that Dürr attempt to determine the amount of still bottoms residue (F005) generated in the containers from the solvent distillation unit which was being disposed in the trash (solid waste landfill).

On December 13, 2011, I conducted a follow up site visit at your facility to my October 27, 2011, CEI. You had begun to utilize the processing bags suggested by the manufacturer for ease of determining how much waste is generated. Kevin Cole of Dürr had been collecting this material and weighing to determine the generation amount of this material. Dürr is now utilizing the processing bags to collect the solvent still bottoms, closing these bags and placing these bags in a hazardous waste drum to be picked up by a hazardous waste hauler. The facility has been generating approximately 20 pounds of solvent distillation waste per month in 2011. This is roughly four times the amount the facility has generated in previous years due to increased production. Mr. Cole also provided a demonstration of how the solvent is placed into the still for distillation and the appearance of the waste solvent still bottoms just after being generated. In addition, you stated that you spoke with your paint supplier about utilizing a different solvent which may not be an F-listed hazardous waste. Your supplier stated that Dürr needed to utilize this F-listed solvent to clean the type of paint used at the facility.

On December 13, 2011, via email I sent you a list of Ohio Commercial Facilities Accepting Hazardous Waste, information on how to find a licensed hazardous waste transporter and the photographs I took during the December 13, 2011, site visit.

Mr. Steve Vollmar, Plant Manager  
February 7, 2012  
Page 2

On January 4, 2012, via email Steve Miller of Dürr sent me analytical of your waste solvent still bottoms dated December 27, 2011, indicating that there were no hazardous waste characteristics associated with this waste.

Based on the October 27, 2011, CEI and the December 13, 2011, site visit, I found the following violation of Ohio's hazardous waste laws:

**1. Unlawful transportation of hazardous waste to an unauthorized facility.  
ORC § 3734.02 (F)**

No person shall unlawfully allow hazardous waste to be transported to an unauthorized facility, a RCRA subtitle D solid waste (non-hazardous) landfill.

Dürr unlawfully disposed of their solvent distillation still bottoms (F005) from their facility into their solid waste stream. Thus Dürr's hazardous waste (F005) was transported by Allied Waste/Republic Services to a RCRA subtitle D solid waste (non-hazardous) landfill for disposal for up to 20 years.

On November 15, 2011, Steve White representing Allied Waste/Republic Services told me via telephone that solid waste from your facility would go to either the Wood County Landfill in Bowling Green, Ohio or the Vienna Junction Landfill in Michigan.

***Dürr offered for transport approximately 1380 pounds or 209 gallons (roughly 3.8 drums) of hazardous waste over the course of 20 years or so.***

Year	Waste generated in pounds	Waste generated in gallons	Waste generated (55-gallon drums)
2011	240	36	0.6
1991-2010	1140	173	3.2
<b>Total</b>	<b>1380</b>	<b>209</b>	<b>3.8</b>

Please be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. In addition, please note that violation of ORC Section 3734.02 (F) is a serious violation of Ohio's hazardous waste laws and Dürr may be referred to Ohio EPA's Central Office for possible escalated enforcement action.

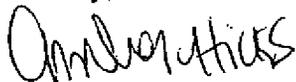
Mr. Steve Vollmar, Plant Manager  
February 7, 2012  
Page 3

Please note that on Mr. Miller's response (analytical) emailed to me on January 4, 2012, Mr. Miller states that your laboratory "conducted a full investigation and determined that the waste produced from the paint distiller is in fact safe to dispose of with regular landfill waste". Please be advised that this is not accurate. Your distillation waste is an F005 listed *hazardous waste* as explained to you during the October 27, 2011, CEI and the December 13, 2011, site visit. Dürr generates an F-listed solvent (D001, F003, F005) which they run through their on-site Sidewinder solvent recovery system. Since Dürr generates an F-listed solvent their solvent still bottoms would also be a hazardous waste (F005). Please consult the copy of OAC Rule 3745-51-31 (which includes the F-listings) that I gave you during the October 27, 2011, CEI. Dürr must manage their F005 solvent distillation bottoms as a hazardous waste and dispose as a hazardous waste following all applicable hazardous waste regulations for a conditionally exempt small quantity generator of hazardous waste. Please consult the Ohio EPA fact sheet Identifying your Hazardous Waste given to you during the CEI.

I have enclosed the U.S. EPA guidance Managing your Hazardous Waste: A Guide for Small Businesses – December 2001. In addition, the following weblink has Ohio EPA's Generator Handbook: [http://www.epa.state.oh.us/portals/32/pdf/gen\\_handbook.pdf](http://www.epa.state.oh.us/portals/32/pdf/gen_handbook.pdf). Please consult these resources for information pertaining to the conditionally exempt small quantity generator hazardous waste requirements.

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082 or email me at [amber.hicks@epa.state.oh.us](mailto:amber.hicks@epa.state.oh.us).

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO  
~~Colleen Weaver, DMWM, NWDO~~

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

**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.