



**Environmental
Protection Agency**

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

Re: WorkflowOne
OHR000108993
Mercer County
Hazardous Waste
Return to Compliance

June 14, 2012

Ms. Cindy Buening
WorkflowOne
515 West Sycamore Street
Coldwater, Ohio 45828

Dear Ms. Buening:

Thank you for your March 26, March 27, April 3, April 10, April 17, and April 20, 2012, responses to Ohio EPA's March 20, 2012, Notice of Violation (NOV) letter. You submitted documentation including: MSDS for Safety-Kleen Premium Gold Solvent and bill of lading for a past waste shipment, a notice of sampling activities, photos of labeled and dated universal waste lamps, a Giant Resource Recovery waste profile for the carb cleaner, a completed Employee Training Record for maintenance personnel responsible for management of universal waste lamps, MSDS for Immersion Cleaner, analytical results for the parts washer and analytical results for the three waste roller wash containers.

My review of this documentation reveals that WorkflowOne (WFO) has adequately demonstrated abatement of the five violations and two general concerns observed during my March 1, 2012, inspection. The following is a summary of the status of each violation and the two general concerns:

**1. Waste Evaluation
OAC Rule 3745-52-11**

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24; or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

WFO has failed to clearly demonstrate that it has evaluated its waste roller wash, according to this rule. In order to abate this violation, you must immediately evaluate the waste roller wash, in accordance with the requirements of Ohio Administrative Code Rule 3745-52-11 and this letter.

WFO must submit documentation that clearly describes each of the materials used to clean the rollers. All of the compounds in the cleaners must be described.

You must obtain a representative sample of the waste at the facility, according to OAC Rule 3745-51-20. You must evaluate the sample, through laboratory analysis, for at least its flash point. WFO will need to give Ohio EPA a five-day advance notice of sampling activities in order for an inspector to make arrangements to view the sampling.

You must submit the results of the laboratory analyses to Ohio EPA as soon as they are available. After Ohio EPA reviews your analytical results, I will inform you of any other violations in a separate letter.

On April 3, 2012, I was present at WFO to observe the sampling of waste roller wash. This waste is only collected in one of three 5-gallon pails. WFO explained that the compounds are correctly reported on the MSDS previously supplied by the facility. Three stations were sampled: Station #1 sample (2 jars) was designated GTO Laser and consisted of mostly thicker ink; Station #2 (2 jars) was mostly liquid and was designated Jets; and Station #3 (2 jars) was again mostly liquid and was designated Rotary. Photos of these samples can be seen in the file.

On April 17, 2012, WFO submitted an analytical report for the three samples of waste roller wash. The result indicates that the typical waste roller wash is liquid and is hazardous waste due to the characteristic of ignitability (D001). As a result of the sampling and analysis, this violation has been abated.

**2. Universal Waste Packaging - Lamps
OAC Rule 3745-273-13(D)(1)**

A small quantity handler of universal waste must contain any lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

WFO did not keep its waste lamps in a closed container. In order to correct this violation, WFO must immediately place all spent lamps into containers or packages that are structurally sound and adequate to prevent breakage of the spent lamps; close each container; and submit photographic documentation that this has been done.

On March 2, 2012, I received an email from WFO with five photos attached. The photos demonstrate that the waste lamps are now stored in closed containers. This was verified on April 3, 2012. Therefore, this violation has been abated.

**3. Universal Waste Labeling - Lamps
OAC Rule 3745-273-14(E)**

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamps", "Waste Lamps" or "Used Lamps".

WFO did not properly label its boxes of waste lamps with one of the required phrases. In order to correct this violation, WFO must properly label each waste lamp container and submit photographic documentation that this has been done.

On April 3, 2012, I observed boxes of Universal Waste lamps marked with the words "Universal Waste Lamps". Therefore, this violation has been abated.

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

A small quantity handler of universal waste who accumulates 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.

WFO was not able to demonstrate the length of time the universal waste lamps were accumulated. In order to correct this violation, WFO must place a date on each container once a universal waste lamp is placed into it and submit photographic documentation that this has been done.

On April 3, 2012, I observed boxes of Universal Waste lamps marked with the appropriate accumulation dates. Therefore, this violation has been abated.

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

A small quantity handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste of the proper procedures. The information shall describe proper handling and emergency procedures appropriate to the type of universal waste handled at the facility.

WFO has not adequately informed its employees, handling universal waste lamps, of the proper handling procedures. In order to correct this violation, WFO must list the employees who may manage used lamps, describe how it will inform (train) its universal waste lamp handlers in proper handling procedures and submit documentation that this has been accomplished. The training must include compliance with all rules for the handling of universal waste lamps and the corrective actions for all violations of universal waste rules, cited above.

On March 27, 2012, WFO submitted a completed copy of the Employee Training Record for maintenance personnel responsible for the management of universal waste lamps, documenting that eight employees received training on March 26, 2012. Therefore, this violation has been abated.

General Concerns:

1. WFO must verify, through laboratory analysis, the flash point of its parts washer solvent. WFO must submit a copy of the analytical results to Ohio EPA as soon as they are available.

On April 3, 2012, Mr. Joe Kahn of Safety-Kleen in Ft. Wayne, Indiana, was present to sample the solvent in a parts washer. Some waste roller wash could end up in the parts washers, since the residue in the roller wash trays is periodically cleaned in the parts washers. WFO stated that they were switching to the Heritage Crystal-Clean product which has a flash point of 120-130°F.

On April 10, 2012, WFO submitted an analytical report for the parts washer sample. The result indicates that the parts washer waste has a flash point of 147°F. Therefore, this waste is not hazardous and WFO has addressed this general concern.

Ms. Cindy Buening
June 14, 2012
Page 5

2. WFO must clearly document its waste evaluation for the 30-gallon container of old carb cleaner waste and submit documentation demonstrating its proper disposal.

This was demonstrated to me on April 3, 2012. A photo of the waste container is in the file. WFO has addressed this general concern.

If you have any questions, please feel free to contact me at (419) 373-3074. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov>.

Sincerely,



Don North
District Representative
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
~~Colleen Weaver, DMWM, NWDO (hard copy)~~

ec: Colleen Weaver, DMWM, NWDO (scanned copy)
Don North, DMWM, NWDO