



**Environmental
Protection Agency**

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

Re: Ridge Engine & Machine
OHD018172718
Lucas County
Hazardous Waste
Partial Return to Compliance

August 22, 2012

Mr. Tom Ridge, Owner
Ridge Engine & Machine
1236 Conant Street
Maumee, Ohio 43537

Dear Mr. Ridge:

Thank you for your August 1, 2012, August 2, 2012, and August 14, 2012, responses to Ohio EPA's July 31, 2012, Notice of Violation (NOV) letter. You submitted information regarding the facility plans for the management of the universal waste bulbs, used oil and waste evaluation for the spent sandblasting material. My review of the documentation submitted reveals that Ridge Engine & Machine (Ridge) has demonstrated partial abatement of the three violations cited in the July 31, 2012, NOV.

The following is a summary of the violations cited in the July 31, 2012, NOV as a result of our July 17, 2012, inspection and your compliance with respect to each:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

- a) At the time of the inspection, Ridge did not have waste evaluation documentation for the spent sandblasting material. Ridge has historically disposed of this spent material as a non-hazardous waste by venting it directly outside the building. A vent pipe is attached directly on to the sandblasting machine and the pipe passes through a hole in the wall of the building. The sandblasting material generated while using the machine on a daily basis is allowed to pass through the vent pipe and is disposed into the air.

Ridge must immediately begin collecting, in a container, the spent sandblasting material as it is generated by the sandblasting machine. This spent material must be collected inside the building and Ridge is directed to discontinue use of the vent pipe until further notice. Ridge must obtain a representative sample of the spent sandblasting waste stream and have it analyzed for Toxic Characteristic Leaching

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Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010). To abate this violation, Ridge must submit a copy of the analytical results to Ohio EPA. Once analytical results have been reviewed, Ohio EPA will advise you on proper disposal options as well as plans for the future management of this waste stream.

Ohio EPA will review the submitted waste evaluation information and determine Ridge's generator status. Additional violations may be cited based upon your determined generator status. You will be notified of any additional violations in a separate letter.

On August 1, 2012, I spoke with you regarding the spent sandblasting material. You stated that a collection bag has been attached to the vent pipe and that an enclosure was being built to house the collection bag. On August 14, 2012, Ridge submitted, via electronic mail, a picture of the collection bag and containment box build to properly collect the spent sandblasting material. Ridge will have this waste stream evaluated once enough has accumulated to collect a representative sample for analysis.

This portion of the violation has not been abated.

- b) In addition, Ridge failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

Hazardous bulbs are considered "spent materials" and remain hazardous waste even when recycled. Hazardous waste lamp generators have the option of handling their lamps as hazardous waste or as universal waste. Managing hazardous waste lamps under the universal waste rules eases certain regulations imposed on generators of spent lamps.

Please be aware that incandescent, fluorescent, metal halide, neon, high-intensity discharge, high-pressure sodium and mercury-vapor lamps could be hazardous waste when discarded. Fluorescent lamps may contain up to 40 milligrams (mg) of mercury, depending on the brand and manufacturer. Lamps may also contain lead and cadmium. Many lamps exhibit a characteristic of toxicity for heavy metals when disposed.

On August 1, 2012, I spoke with you regarding the management of spent fluorescent lamps. Ridge plans to manage the spent lamps as universal waste. You stated that Gross Electric (GE) will be brokering your lamps. Spent fluorescent lamps will be taken by GE to Environmental Recycling in Bowling Green, Ohio where they will be recycled.

With this information, this portion of the violation has been abated.

This violation has not been completely abated.

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2. 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."

Ridge had six 5-gallon buckets of used oil that were not properly labeled.

On August 2, 2012, Ridge submitted, via electronic mail, photographic documentation showing the contents of the six 5-gallon buckets of used oil now contained in a 55-gallon drum properly labeled "used oil".

With this information, this violation has been abated.

3. 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.

Ridge has been giving the used oil they generate to various customers for their personal used oil burners.

Ridge must immediately cease giving used oil to any person or transporter who does not have an EPA identification number.

In order to correct this violation, Ridge must notify Ohio EPA with how you plan to manage your used oil in the future and provide the applicable documentation for review.

This violation has not been abated and remains outstanding.

Please submit documentation demonstrating abatement of the above outstanding violations to this office ***within 15 days*** of your receipt of this letter.

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/>.

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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 Materials and Waste Management

/llr

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.