



**Environmental  
Protection Agency**

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

**Re: Anderson & Vreeland Inc.  
OHD017556853  
Williams County  
DMWM, NWDO  
Partial Return to Compliance**

July 23, 2012

Mr. Rick Hubert  
Anderson & Vreeland Inc.  
P. O. Box 527  
Bryan, Ohio 43506

Dear Mr. Hubert:

Thank you for sending the documentation in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notices of Violation (NOVs) dated September 8, 2011, December 15, 2011, and March 16, 2012. The documentation submitted by Anderson & Vreeland Inc. (A&V) was received by Ohio EPA on March 14, 2012, April 27, 2012, and June 6, 2012, and included personnel training documents and waste evaluation documentation. Ohio EPA also met with A&V on March 29, 2012, at the A&V facility in Bryan. During this meeting, Ohio EPA reviewed some documentation that abated some violations listed below.

The following is a summary of the violations observed during the July 26, 2011, compliance evaluation inspection (CEI) and the January 5, 2012, follow-up inspection. Your facility's compliance with respect to each violation is outlined below. In an attempt to streamline this letter, details concerning previously abated violations or general concerns which have been addressed in previous correspondence have been omitted. **Please submit the required information within 14 days of receipt of this letter.**

**Violations:**

The following violations were observed during the July 26, 2011, CEI and were originally cited in my September 8, 2011, NOV.

- 1. Ohio Revised Code (ORC) Section 3734.02(E) & (F), Unpermitted Hazardous Waste Treatment, Storage & Disposal:** A&V responded to this violation on October 10, 2011. This violation has not been abated.
- 2. ORC Section 3734.02 (F), Unlawful transportation of a hazardous waste:** A&V responded to this violation on October 10, 2011. This violation has not been abated.

**3. Ohio Administrative Code (OAC) Rule 3745-52-11, Hazardous Waste**

**Determination:** "Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste..."

A&V failed to adequately evaluate the waste streams listed below to determine if they were a hazardous waste in accordance with OAC Rule 3745-52-11, prior to sending them off site.

- a) Old inventory waste-**Abated October 10, 2011**
- b) Waste paint-No information received to date.
- c) Paint booth filters-**Abated April 27, 2012**
- d) Bag house dust-**Abated January 31, 2012**
- e) Hard reclaim/ mfg powder/pressure tank clean-out waste from the phenolic powder process-**Abated on April 27, 2012**
- f) Photopolymer solids from Orbital X machine-**Abated April 27, 2012**
- g) Recirculated water (Cosmolight water) from Orbital X machine-Additional questions, please see below.
- h) Photopolymer solids from laser machine-Additional information requested, please see below.
- i) Liquid Resin plus flexowash A waste-**Abated November 29, 2011**
- j) Lubricant waste from slitter machine-**Abated January 31, 2012**
- k) Solids removed from the lubricant waste from the slitter machine-**Abated March 29, 2012**
- l) ADA laminator overspray-**Abated January 31, 2012**
- m) AV Solve-Additional information requested, please see below.
- n) AV Solve II-Additional information requested, please see below.
- o) Print tight solution from the testing department- Additional information requested, please see below.
- p) Testing department Cosmolight solution- Additional information requested, please see below.
- q) Testing department AV Solve- Additional information requested, please see below.
- r) Testing department liquid resin waste-**Abated January 31, 2012**
- s) Water based black ink-No information received to date.
- t) ADA adhesive-**Abated December 14, 2011**

**On March 29, 2012, during a meeting between Ohio EPA and A&V, A&V stated that solids from the slitter machine (item k above) will no longer be generated.**

**On April 27, 2012, Ohio EPA received analytical results from the sampling of several waste streams.**

From the submitted results, it appears the paint booth filters (3c) and photopolymer solids from Orbital X machine (also known as waste polymer sludge)(3f) are non-hazardous wastes.

On April 27, 2012, Ohio EPA also received a narrative describing how the bag house dust and the hard reclaim/ mfg powder/pressure tank clean-out waste from the phenolic powder process is the same waste stream. Therefore, 3e above is considered abated.

On April 27, 2012, Ohio EPA received total analytical results from a sample of the laser machine waste. Method 1311, Toxicity Characteristic Leaching Procedure, states that "If a total analysis of the waste demonstrates that individual analytes are not present in the waste, or that they are present but at such low concentrations that the appropriate regulatory levels could not possibly be exceeded, the TCLP need not be run." The analytical provided does not demonstrate that RCRA metals are at such a low concentration that they could not possibly exceed the appropriate regulatory levels. Therefore, this waste stream needs to be analyzed for TCLP RCRA metals.

On June 6, 2012, Ohio EPA received analytical that the cosmilight water is non-hazardous waste. However, the information submitted to Ohio EPA shows that the title of the analytical results is "Filtered Cosmolight Water." Please explain when the cosmilight sample was filtered, who filtered the sample, and why it was filtered.

Ohio EPA also received a response from A&V on June 6, 2012, that the waste paint thinner will be considered hazardous for barium. Therefore, that waste stream is hazardous for D001, D005, D035, F003, and F005.

During the initial inspection, A&V stated that the print tight solution waste, cosmilight solution waste, and the AV solve waste generated in the testing department were different than the print tight solution waste, cosmilight solution waste, and AV solve waste generated in the process area. This was due to the fact that the wastes in the testing department were made up of different tests being run which resulted in different polymers, initiators, etc. being used and included in the testing department waste streams. Therefore, violation 3 in the NOV's list the print tight solution waste(violation 3o in the NOV's), cosmilight solution waste (violation 3p in the NOV's), and the AV solve waste (violation 3q in the NOV's) generated from the testing department as

separate wastes from the print tight solution waste (violation 3f in the NOVs), cosmilight solution waste (violation 3g in the NOVs), and the AV solve waste (violation 3m and 3n in the NOVs) generated in the process area. During the March 29, 2012, meeting, A&V stated that the waste streams generated in the testing department (print tight solution waste, cosmilight solution waste, and the AV solve waste) are the same as the wastes generated in the process area (print tight solution waste, cosmilight solution waste, and the AV solve waste). During the meeting, Ohio EPA requested that A&V submit a narrative that describes this. If the waste streams generated in the testing department really are the same as the waste streams generated in the process area, then A&V needs to provide narratives that describes the print tight solution waste generated from the testing department (3o) and the print tight waste generated in the process area (3f) are the same waste. A&V will need to provide a narrative that the cosmilight solution waste generated from the testing department (3p) and the cosmilight solution waste generated in the process area (3g) are the same waste. A&V will need to provide a narrative that the AV Solve waste generated from the testing department (3q) and the AV Solve waste generated in the process area (3m and 3n) are the same waste.

At this time Ohio EPA has not received waste evaluation documents for all the waste streams listed above. Please send the requested information within 14 days of receipt of this letter.

4. OAC Rule 3745-52-20(A)(1)-Abated on October 10, 2011.
5. OAC Rule 3745-270-07(A)(1)-Abated on March 1, 2012.
6. OAC Rule 3745-270-07(A)(2)-Abated on March 5, 2012.
7. OAC Rule 3745-52-34(D)(1)-Abated on October 10, 2011.
8. OAC Rule 3745-52-34(D)(5)(b)-Abated on October 10, 2011.
9. OAC Rule 3745-65-33-Abated on January 5, 2012.
10. OAC Rule 3745-66-74-Abated on January 5, 2012.
11. OAC Rule 3745-52-34(D)(5)(c), Accumulation time of hazardous waste: "A generator who generates greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that

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is generated on-site without an Ohio hazardous waste permit, provided that...the generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies."

A&V failed to train their employees on proper waste handling and emergency procedures including the official designation of emergency coordinators and proper emergency protocol in contacting these emergency coordinators.

**On March 14, 2012, Ohio EPA received documentation that A&V properly trained their employees.**

**Therefore, this violation is considered abated on March 14, 2012.**

12. OAC Rule 3745-52-34(D)(4)-Abated January 10, 2012.

13. OAC Rule 3745-66-73(A)-Abated on October 10, 2011.

The following violations were observed during the January 5, 2012, follow-up inspection.

14. ORC Section 3734.02(E)&(F), Unpermitted Hazardous Waste Treatment, Storage & Disposal: A&V and Ohio EPA discussed this violation during the March 29, 2012, meeting. This violation has not been abated.

**Outstanding Issues:**

1. **Pump Cleaning Waste**: This issue was discussed during the March 29, 2012, meeting. At this time, Ohio EPA has not received adequate analytical to determine if the pump cleaning waste is characteristic hazardous waste and if the F003 hazardous waste listing applies as indicated by reviewing the material safety data sheets.

In order to make this determination, A&V must properly obtain a representative sample of this waste stream and have it analyzed per the hazardous waste rules and regulations at a commercial environmental laboratory. Ohio EPA understands that this waste stream is generated on an irregular basis. Please contact Ohio EPA as soon as possible once this waste stream has been generated.

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Please send all correspondence **within 14 days of receipt of this letter**, to Ohio EPA, Northwest District Office, Attn: Kara Reynolds, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kara Reynolds  
Environmental Specialist  
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO ;  
Kara Reynolds, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO  
Mitch Mathews, DMWM, CO

**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.