



**Environmental  
Protection Agency**

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

CW

Re: Ridge Engine & Machine  
OHD018172718  
Lucas County  
Hazardous Waste  
**Notice of Violation**

July 31, 2012

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

Dear Mr. Ridge:

On July 17, 2012, Wendy Miller and I conducted a compliance evaluation inspection at Ridge Engine & Machine (Ridge) located at 1236 Conant Street, in Maumee, Ohio. We inspected Ridge 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). Pollution prevention options were also discussed during this inspection. This letter will explain the violations we found and what you need to do to correct these violations.

During our visit we spoke with your employee, Steve Eisenbrandt, observed your operations and reviewed paperwork. Ridge specializes in automotive engine repairs. Used oil is generated and stored in 5-gallon buckets. Ridge gives the used oil generated to customers who use it in their on-site used oil burners. Two parts washers and two hot water pressure washers are serviced by DISC Environmental. No painting is conducted on-site and shop towels are laundered by Aramark.

Spent sandblasting material is also managed as a solid waste. Spent fluorescent lamps are managed as a solid waste. At the time of our inspection, Ridge was operating as a non-generator of hazardous waste.

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

**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 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 may use the data you collect, in part, to make regulatory decisions concerning the waste(s) tested. A data review process, referred to as data validation, may be utilized to confirm the validity of the data. This data validation can include a review of the following components: sampling techniques, sample containers, representativeness of sample, laboratory test methods, laboratory data completeness, and documentation of holding time(s), chain(s) of custody and quality assurance/quality control (QA/QC) data. Please include data sufficient for Ohio EPA to perform the data validation review. Information on conducting a data validation can be obtained from Ohio EPA's web page:  
[http://www.epa.state.oh.us/dhwm/tier\\_i\\_data\\_validation\\_manual.html](http://www.epa.state.oh.us/dhwm/tier_i_data_validation_manual.html).

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.

- 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. A copy of Fluorescent Lamps: What You Should Know, was given to Steve at the time of our inspection. I recommend that you review this document and contact me if you have any questions.

Ridge must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If Ridge plans to manage the spent fluorescent bulbs when generated as universal waste, please submit the name of the facility where you plan to recycle the bulbs. Managing the spent fluorescent bulbs as universal waste eliminates the need for analytical testing.

**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.

Ridge must properly label the six 5-gallon buckets with the words "Used Oil" and submit photographic documentation to demonstrate compliance. A copy of the fact sheet, The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil, was given to Steve at the time of our inspection. Please review this information and contact me if you have any questions.

**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. A list of used oil recyclers was given to Steve at the time of our inspection. Please review this list and contact me if you have any questions. In addition, two fact sheets which outline burning used oil in a space heater for businesses and homeowners are enclosed for review.

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.

Ridge needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of receipt of this letter, Ridge is requested to provide documentation to this office including the steps taken to abate the violations cited above.

Mr. Tom Ridge  
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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, Ridge is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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

/cg

Enclosures

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

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO  
Karen Granata, Chief, Air Resources, Toledo Division of Environmental Services

**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<br><input type="checkbox"/> | <b>Ohio Environmental Protection Agency</b><br><b>RCRA SUBTITLE C SITE</b><br><b>IDENTIFICATION/VERIFICATION FORM</b> | For Ohio EPA use only |
|--|---|-----------------------|

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><br><b>Site Name</b>   | EPA ID Number: <b>OHD018172718</b>             |                                    | Website:<br>(Optional)               |                                     |                                    |                                       |                                   |                                   |
|  | Name: <b>Ridge Engine &amp; Machine</b>        |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
| <b>Site Location Information</b>   | Street Address: <b>1236 Conant Street</b>      |                                    |                                      |                                     |                                    |                                       |                                   |                                   |
|  | City, Town, or Village: <b>Maumee</b>          |                                    | State: <b>OH</b>                     |                                     |                                    |                                       |                                   |                                   |
|  | County Name: <b>Lucas</b>                      |                                    | Zip Code: <b>43537</b>               |                                     |                                    |                                       |                                   |                                   |
| <b>Site Land Type</b><br>(check only one)  | Private<br><input checked="" type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |
| <b>NAICS code(s)</b><br><a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a> |  |                                    |                                      |                                     |                                    |                                       |                                   |                                   |

|  |                                   |  |           |                         |  |
|--|-----------------------------------|--|-----------|-------------------------|--|
| <b>Facility Representative</b><br><br>Additional names can be recorded in number 12<br><br>Only provide address information if it is different than the site address | First Name: <b>Tom</b>            |  | MI:       | Last Name: <b>Ridge</b> |  |
|  | Title: <b>Owner</b>               |  |           |                         |  |
|  | Phone Number: <b>419-893-3331</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><br>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<br><input type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |           |
|   | Street or P.O. Box:         |                                     |                                    |                                      |                                     |                                    |                                       |                                   |                                   |           |
|   | City, Town or Village:      |                                     |                                    |                                      | Owner Phone #:                      |                                    | Country:                              |                                   |                                   | Zip Code: |
|   | State:                      |                                     |                                    |                                      | Date Became Operator (mm/dd/yyyy):  |                                    |                                       |                                   |                                   |           |
|   | Operator Type:              | Private<br><input type="checkbox"/> | County<br><input type="checkbox"/> | District<br><input type="checkbox"/> | Federal<br><input type="checkbox"/> | Indian<br><input type="checkbox"/> | Municipal<br><input type="checkbox"/> | State<br><input type="checkbox"/> | Other<br><input type="checkbox"/> |           |
|   | Street or P.O. Box:         |                                     |                                    |                                      |                                     |                                    |                                       |                                   |                                   |           |
|   | City, Town or Village:      |                                     |                                    |                                      | Operator Phone #:                   |                                    | Country:                              |                                   |                                   | Zip Code: |
|   | State:                      |                                     |                                    |                                      | Date Became Operator (mm/dd/yyyy):  |                                    |                                       |                                   |                                   |           |

**VIOLATIONS CITED?**     Yes     No

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

|   |  |  |
|---|--|--|
| <input type="checkbox"/> Not a HW Generator | <input checked="" type="checkbox"/> UNKNOWN:<br>Cited for violation of 3745-52-11  | <input type="checkbox"/> Large Quantity Generator (LQG)                    |
|   | <input type="checkbox"/> Short-Term/Temporary Generator<br>(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"/> 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 |



**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?<br>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"/> |
|----|--|--|

*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#?                                      | Yes <input type="checkbox"/> No <input checked="" 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.*

## PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

**Facility Name:** Ridge Engine & Machine

**Facility Type:** LQG/SQG/CESQG/TSD

**EPA ID#:** OHD018172718

### Description of Waste

### On-Site Management

### Off-Site Management

| Process/Activity<br>Generating Waste<br><small>(e.g. plating bath, machining,<br/>baghouse, painting, etc)</small> | Waste<br>Generated<br><small>(e.g. sludge, spent<br/>solvent, ash, etc)</small> | EPA Waste<br>Code                           | QTY<br>Generated<br>per Month | On-Site Management   |  | Waste Location<br><small>(Include map if possible)</small> | Name, state, and type of activity<br>occurring at the facility.  |
|--|---|---|-------------------------------|--|--|--|--|
|  |   |   |                               | Type of<br>Accumulation<br>/<br>Storage<br><small>(e.g. containe<br/>r, tank,<br/>etc)</small> | Type of On-<br>Site<br>Treatment<br><small>(recycle, wwt,<br/>etc)</small> |  |  |
| 1  | Lighting  | Spent<br>Fluorescent<br>Bulbs               | 52-11 Cited                   |  |  | None in storage at time<br>of the inspection               | Currently managing as a solid<br>waste.  |
| 2  | Sandblasting  | Spent<br>Sandblasting<br>Material           | 52-11 Cited                   | Unknown,<br>however,<br>the unit is<br>used every<br>day.                                      |  | Vented to the outside                                      | Currently managing as a solid<br>waste. Spent material is vented<br>outside via a vent pipe attached to<br>the sandblasting unit.  |
| 3  | Small Parts<br>Washing  | Spent Zep<br>parts washer<br>water          | Non-Haz per<br>DISC           | Approx.<br>200 gallons<br>a year   |  | Parts Washer   | DISC Environmental services the<br>two water-based parts washers once<br>or twice a year. Last pick-up of<br>waste water/oil was on 4/16/12. Sent<br>to Usher Oil in Detroit, MI.  |
| 4  | Large Parts<br>Washing  | Spent hot<br>water pressure<br>washer water | Non-Haz per<br>DISC           | Approx.<br>200 gallons<br>a year   |  | Parts Washer   | DISC Environmental services the<br>two hot water pressure washers<br>once or twice a year. Last pick-up of<br>waste water/oil was on 4/16/12. Sent<br>to Usher Oil in Detroit, MI. |