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State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

February 13, 2008

Ms. Sheryl Nutter
Fairfield Screw
505 Slocum Street
Lancaster, OH 43130

**RE: Fairfield County
Fairfield Screw
CESQG
NOV/ NOC
Complaint Investigation**

Dear Ms. Nutter:

On February 07, 2008, Ohio EPA, CDO (Central District Office), DHWM (Division of Hazardous Waste Management) staff (myself) investigated a complaint filed against Fairfield Screw. The complaint alleged the dumping of solvents and chemicals.

CDO staff arrived on site at 10:00 AM, I introduced myself to you and informed you Ohio EPA had received a complaint and the nature of that complaint as stated above. I conducted a complaint investigation with the help of you, and Rusty and Dennis of your staff and did not find evidence of any chemical or solvent spills in the alley. There were empty drums in the alley which J. Topy and Sons had delivered to hold metal shavings of aluminum, steel and brass which are accumulated and stored inside the building until they can be recycled.

From the information gathered during the complaint investigation there was no evidence to support the complaint.

Since we were on site for a complaint investigation we conducted a compliance evaluation inspection (CEI) for the hazardous waste and used oil which Fairfield Screw generates. The purpose of the inspection was to determine compliance with Ohio's hazardous waste regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC), and the Ohio Revised Code (ORC). Ohio EPA's inspection included an inspection of facility operations and a review of records.

Based on this inspection, Ohio EPA has determined Fairfield Screw has violated the following hazardous waste rules or laws.

1. **OAC Rule 3745-279-22 (C), Label Containers of Used Oil:** While being accumulated each container and tank of used oil must be labeled or marked clearly with the words "Used Oil."

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Ms. Sheryl Nutter
Fairfield Screw
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During the inspection, the containers of used oil were not labeled with the words "Used Oil."

Fairfield Screw Staff labeled the containers with the words "Used Oil" while I was on site.

This violation is now returned to compliance.

While on-site we provided you with a publication from the Office of Compliance Assistance and Pollution Prevention (OCAPP) on auto repair shops because it had information on the handling of used oil and lists of disposal sites for used oil. When I got back to the office I contacted OCAPP staff about outlets for your waste water soluble oil. They found several places which may take your waste water soluble oil. These are: Clean Water Limited at 2480 Jackson Pike Columbus, Ohio 43223, (614) 539-8238; Refuel Environmental Services, 4280 Groves Road, Columbus, Ohio 43232, (614) 863-9724; All American Sanitation Services, 5101 Thompson Rd., Gahanna, Ohio 43230, (614) 471-4884 and Central Ohio Oil Environmental Services, 795 Marion Road, Columbus, Ohio 43207 (614) 443-9728 or (614) 0443-1014.

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.odod.state.oh.us/cdd/oeef/>

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact our office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Ohio EPA has helpful information about this at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp/>

Enclosed you will find a copy of the checklists that we completed as a result of the inspection. Should you have any questions, please feel free to call me at (614) 728-5036. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Chris Bulinski
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosures

c: CDO-File with enclosures
Tammy McConnell, DHWM/CO with enclosures

E-mail this completed form to
 tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: No ID number

3. Site Name Name: Fairfield Screw Website (optional):

4. Site Location Information
 Street Address: 505 Stocum Street
 City, Town, or Village: Lancaster State: OH
 County Name: Fairfield Zip Code: 43130

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
X							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A. 333512	B.
C.	D.

7. Facility Representative: Sheryl Nutter

MI: Phone Number: 740-653-7627 Phone Number Extension:
 E-Mail Address:
 Fax Number: 740-653-7628 Fax Number Extension:
 Street or P.O. Box:
 City, Town or Village:
 State: Country: Zip Code:

8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: Fairfield Screw Date Became Owner (mm/dd/yyyy):

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	X							

Street or P.O. Box:
 City, Town, or Village: Owner Phone #:
 State: Country: Zip Code:

B. Name of Site's Operator: Date Became Operator (mm/dd/yyyy):

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other

Street or P.O. Box:
 City, Town, or Village: Operator Phone #:
 State: Country: Zip Code:

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

<input type="checkbox"/> Not Regulated
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities	
(choose only one of the following categories)	<input type="checkbox"/> 3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> 4. Recycler of Hazardous Waste
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/> 6. Underground Injection Control Facility
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/> 7. Hazardous Waste Transporter

B. Universal Waste Activities	C. Used Oil Activities															
<input type="checkbox"/> 1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/> 1. Used Oil Generator															
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/> 2. Used Oil Transporter Indicate Type(s) of Activity(ies) <input type="checkbox"/> Transporter <input type="checkbox"/> Transfer Facility															
<input type="checkbox"/> 3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/> 3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies) <input type="checkbox"/> Processor <input type="checkbox"/> Re-refiner															
<table border="1"> <thead> <tr> <th></th> <th>Generated</th> <th>Accumulated</th> </tr> </thead> <tbody> <tr> <td>A. Batteries</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>B. Pesticides</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>C. Thermostats</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>D. Lamps</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>		Generated	Accumulated	A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>	B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> 4. Off-Specification Used Oil Burner
	Generated	Accumulated														
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>														
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>														
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>														
D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>														
	<input type="checkbox"/> 5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies) <input type="checkbox"/> a. Marketer Who Directs Shipment of Off- Specification Oil <input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner															

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001						
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

N	Announced ?	Additional Facility Representatives:	Rusty and Dennis
N	Tanks?	Other comments:	
Y	Containers?		

13.	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Chris Bulinski		02-07-2008 10:00 AM

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)
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**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)] 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

Fairfield Screw operates a machine shop which manufactures screws, auto and other small metal parts. The machines use cutting oil which when spent is picked up and processed by Central Ohio Oil or Heartland Petroleum. Stoddard Solvent from G&G Solvent with a 100 degree flash point is used to clean parts first and then shavings. It is mixed with and sent off with the used oil. Three drums of this solvent are used each year about one quarter drum a month is generated. Aluminum shavings are sold to Topy and Sons. Brass shavings are sold to Chase Brass in Montpelier, Ohio and Cerro Metal Products, Belfont PA.. All used oil with solvent and drums of metal shavings are stored inside the building.

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [3745-279-21(A)] Yes ___ No N/A RMK# ___
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 ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# 1
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___

- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___
- 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 ___ No N/A RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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 ___ No N/A RMK# ___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK# ___
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No N/A RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No ___ N/A ___ RMK# ___

C:\Chris Files\DHWM\Inspections\Fairfield Screw\USED OIL 2008.wpd

REMARKS

1. The containers of used oil were not labeled but were labeled during the inspection.