Ohio | Environmental Protection Agency

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

March 17, 2011

Ms. Judy Wells, Superintendant
Apollo Career Center
3325 Shawnee Road
Lima, Ohio 45806-1497

RE: Apollo Career Center (OHD981955032)

Dear Ms. Wells,

I have been informed of the results of the inspection conducted at your facility on March 11, 2010, by Ohio EPA's Division of Hazardous Waste Management. I am conscious of your efforts to work with the staff here at Ohio EPA to reach a resolution of these matters and I realize it has taken a considerable amount of time to sort out the various waste evaluation issues at your facility. I appreciate your patience.

Apollo Career Center (Apollo) generates a number of waste streams that often vary in nature and there is also a tendency for the waste generation rates to fluctuate with the school calendar. These factors make it more difficult to make waste evaluation assessments. Some of the waste streams that fall into this more difficult evaluation category are the waste paints, waste paint booth filters and parts cleaner solvent waste. What follows are Ohio EPA's recommendations regarding the proper evaluation and management of each of these waste streams.

Paint/Coating Related Waste Streams: Apollo and Ohio EPA have discussed two types of waste paint generated at your facility. Enamel paint waste, which is being managed as a hazardous waste, and latex paint waste, which, according to recent Material Safety Data sheet submittals, could either be hazardous or non-hazardous waste. If these two paint types are mixed, the resulting mixture may be, at a minimum, ignitable hazardous waste (D001), as described in Ohio Administrative Code (OAC) rule 3745-51-21. Additionally, the paint may contain hazardous constituents (e.g., metals such as barium from white paint) which may cause the waste paint to be characteristically hazardous as described in OAC rule 3745-51-24.

Furthermore, Apollo generates known listed hazardous waste, F005, from other painting/coating operations at Apollo. In order to limit/reduce the total volume of hazardous waste generated at its facility, Apollo should take care to keep listed hazardous waste separate from other non-hazardous wastes. Generally speaking, listed hazardous waste when mixed with non-hazardous waste causes the entire mixture to become listed hazardous waste. Making every attempt to insure listed hazardous wastes, such as the spent solvents from cleaning the paint guns (listed hazardous waste, F005), is kept separate from non-hazardous waste paint will minimize the amount of listed hazardous waste your facility will have to manage.

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Waste Paint Booth Filters: As Apollo and Ohio EPA have previously discussed, Apollo generates waste filters from various locations in the paint booths. Apollo must evaluate paint booth filters from the different locations in the paint booth separately as they are unique points of generation. For example, the air intake filters which do not come into contact with paint/coating material do not need to be further analyzed unless a process change occurs (e.g., a different type of filter is used which is made up of materials which when spent could exhibit the characteristic of a hazardous waste). However, the other paint booth filters, such as the floor filters, which are more contaminated with paint waste due to the downdraft filtering process of the paint booth, need to be further evaluated in accordance with OAC rule 3745-52-11. The evaluation of the floor filters could include using a combination of knowledge of the hazardous constituents that may be present in the paints, and representative sampling of the spent filter(s). For example, if the only hazardous constituents of concern in the paints being used are metals, then the sampling could be limited to just metals to minimize the cost of testing.

Parts Washer Solvent Waste: Apollo contracts with Heritage Crystal Clean to use 142+ Fahrenheit Flash mineral spirits in Apollo's parts washer(s). The parts washer fluid is specifically designed to not exhibit the characteristic of ignitability when it becomes a waste, if used properly. However, depending on the kind of materials being removed in the cleaning/degreasing process, the spent parts washer solvent waste could contain hazardous constituents (e.g., metals) that may cause the spent parts washer solvent waste to be a hazardous waste. To ensure a proper waste evaluation it is important that the parts washer solvent waste be sampled for all hazardous constituents which may be present, such as metals. Please see OAC rule 3745-52-11(C)(1) for methods to test this waste.

I hope you find this information helpful. We recognize that these wastes are only a subset of the wastes generated at Apollo Career Center. If you have additional questions or concerns about the information in this letter or the proper evaluation and management of any other waste streams at your facility, I encourage you to contact Kelly Smith of my staff at (614) 644-3174 or kelly.smith@epa.state.oh.us. Ohio EPA also maintains an office of Compliance Assistance and Pollution Prevention which is specifically tasked with helping small businesses comply with environmental regulations and assisting in reducing their waste streams. If you wish to utilize the services of this office, please contact Mike Kelley at (614) 644-3469.

Sincerely,

Harry Sarvis, Manager
Compliance Assurance Section
Division of Hazardous Waste Management

ec: Todd Anderson, Legal
Kara Reynolds, DHWM, NWDO
Mike Kelley, OCAPP

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