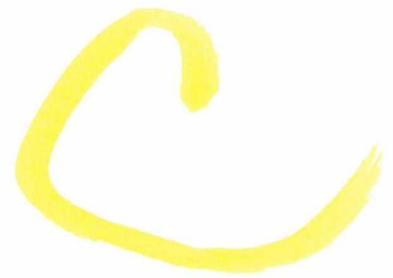


**Environmental  
Protection Agency**

John E. Kasich, Governor  
Mike Taylor, Lt. Governor  
Scott J. Davis, Director



September 18, 2012

RE: GASPAR, INC.  
OHR000117671  
STARK COUNTY  
COMPLAINT 7528  
NOTICE OF VIOLATION

Mr. Tad Gaspar  
Gaspar, Inc.  
1545 Whipple Ave., SW  
Canton, OH 44710

Dear Mr. Gaspar:

On August 24, 2012, Karen Nesbit and I, of the Ohio EPA's Division of Materials and Waste Management, conducted a hazardous waste complaint investigation at Gaspar, Inc., located at 1545 Whipple Ave., SW, Canton, Ohio. The purpose of our visit was to investigate a complaint received by Ohio EPA alleging that Gaspar was dumping coolant down the storm drain, dumping used oil to kill weeds and dumping spent blasting sand on the property. You represented Gaspar during our investigation.

Gaspar fabricates pressure vessels and shell and tube exchangers from carbon steel and stainless steel. The completed vessels are sand blasted and painted in a closed room used only for this purpose. We asked if you had any air pollution control permits for the blasting/painting room and you told us that you were unaware of any air permits for the room. I suggest that you contact Adrienne LaFavre with the Office of Compliance and Pollution Prevention to work with you and help you determine what, if any, air pollution control permits you may need. You can reach Adrienne at (330) 963-1250 or by email at [Adrienne.LaFavre@epa.ohio.gov](mailto:Adrienne.LaFavre@epa.ohio.gov)

The blasting sand accumulates on the floor of the blasting/painting room and at some point it is no longer usable. You told us that the sand has been used for fill on your property to slow down erosion along the southwest corner of the property. As we walked along the property it became visually apparent where the sand was used.

We could not find any evidence that used oil is used to kill weeds or that coolant is being dumped down the storm drain. Please be advised that OAC Rule 3745-27-05(C) prohibits the open dumping of solid waste. You may have violated this rule by spreading spent blasting sand along the southwest corner of your property. Any solid waste violations regarding the use of the blasting sand will be addressed by the Canton City Health Department.

Based on the results of the complaint investigation, Gaspar is in violation of the following hazardous waste rule:

1. OAC 3745-52-11; Waste evaluation. Any person who generates a waste must determine if that waste is a hazardous waste.

Gaspar failed to evaluate the spent blasting sand to determine if it is a non-hazardous or hazardous waste. The material should be analyzed to determine if the spent sand contains elevated levels of metals. You will want to have an environmental lab run the TCLP and total metals tests on a representative sample of the spent blasting sand.

To return to compliance with this violation, please submit the results from the analysis obtained from a representative sample of the blasting sand.

In addition to the above violation, the Ohio EPA notes the following concerns:

2. Gaspar uses paint pots to paint the vessels it manufactures. At the time of the inspection we didn't see any containers of waste paint generated from the painting room. Please explain in your response letter how Gaspar manages paint that remains in the paint pots after painting a vessel.
3. We noted 4 drums being stored outdoors. One was labeled MEK, one was labeled not MEK, one was empty and one contained hydraulic fluid. A better management practice would be to store the drums indoors or under some kind of roof to protect the drums from the elements.
4. Gaspar uses rags and methyl ethyl ketone (MEK) to clean the tube sheets it manufactures. The waste rags are disposed of as solid waste. Be advised that any waste that contains greater than 200 mg/l of MEK when tested by the Toxicity Characteristic Leaching Procedure (TCLP) is a hazardous waste. As per OAC 3745-52-11, you must determine whether these waste rags are hazardous waste. As an alternative or in addition to this, you may want to consider having these dirty rags sent to a commercial laundry.
5. Please submit a copy of the paperwork for the past 3 years showing where used oil is shipped.
6. At the back of the property we noted 50 plus drums. Some had Bluemax 2000 flux in them which was a granular solid. Most were empty and some had rain water in them. Gaspar should evaluate the contents of the drums and then have the drums removed.

GASPAR, INC.  
SEPTEMBER 18, 2012  
PAGE – 3 –

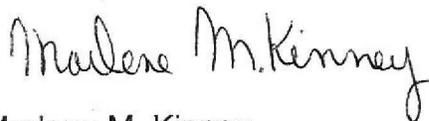
Gaspar needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Gaspar is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [marlene.kinney@epa.ohio.gov](mailto:marlene.kinney@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, Gaspar is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dmwm.aspx>

Should you have any questions, please feel free to call me at (330) 963-1162 or email me at [marlene.kinney@epa.state.oh.us](mailto:marlene.kinney@epa.state.oh.us)

Sincerely,



Marlene M. Kinney  
Environmental Specialist  
Division of Materials and Waste Management

MMK:ddw

Enclosure

ec: Jeff Mayhugh, DMWM, CO  
Nyall McKenna, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO

cc: Dave Dysle, DMWM, NEDO  
Maria Hall, Canton City Health Department

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>		For Ohio EPA use only
Completed verification forms required to be submitted to CO should be e-mailed to <a href="mailto:brad.hauser@epa.state.oh.us">brad.hauser@epa.state.oh.us</a> .			
<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHR000117671</b> Name: <b>Gaspar, Inc</b> Website: (Optional) Street Address: <b>1545 Whipple Ave. SW</b> City, Town, or Village: <b>Canton</b> State: <b>OH</b> County Name: <b>Stark</b> Zip Code: <b>44710</b> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Tad</b> MI: <b>R.</b> Last Name: <b>Gaspar</b> Title: <b>VP</b> Phone Number: <b>330-477-2222</b> Phone Number Extension: <b>152</b> E-Mail Address: <b>tad.gaspar@gasparinc.com</b> 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> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Gary W. Gaspar</b> Date Became Owner (mm/dd/yyyy): <b>May 1967</b> Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: <b>1545 Shipple Ave SW</b> City, Town or Village: <b>Canton</b> Owner Phone #: <b>330-477-2222</b> State: <b>Ohio</b> Country: <b>USA</b> Zip Code: <b>44710</b> Name of Site's Operator: Date Became Operator (mm/dd/yyyy): Operator Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: Operator Phone #: State: Country Zip Code:		
<b>VIOLATIONS CITED?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>			
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (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"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" 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		

**TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)**

- |   |  |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter                    | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace       |
| <input type="checkbox"/> Hazardous Waste Transfer Facility              | <input type="checkbox"/> Small Quantity On-Site Burner Exemption       |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste                    | <input type="checkbox"/> Underground Injection Control Facility        |
| <input type="checkbox"/> 72-Hour Recycler                               | <input type="checkbox"/> Receives Hazardous Waste from Off-site        |

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))**

- |   |   |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste                                    | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced       Yes     No      Additional Facility Representatives:  
Tanks               Yes     No  
Containers         Yes     No

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Marlene Kinney	Karen Nesbit	08/24/2012

**Comments:**  
Complaint investigation. Complaint 7528

*Waspac, Inc.*

**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] *Spent Blasting Sand* 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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.*

**MIX HAZARDOUS WASTE WITH USED OIL**

5. Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:

a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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- Have a parts washer that is maintained a TSD/F on a scheduled basis
- No used oil was being accumulated at the time of the inspection

September 2009

## Does My Small Business Need an Air Permit?

### Does my business need an air permit?

Environmental regulations are complex and determining if your business needs an air permit can be confusing. Under state and federal regulations, it is the business owner's responsibility to obtain all necessary permits.

### How do I know if my business needs a permit?

Air pollution permits are required for "air contaminant sources." A business may have any number of sources at its facility. Each source must have a permit unless it is specifically exempt.

#### Some businesses that typically require air permits include:

- Asphalt plants
- Auto body shops
- Crematories
- Dry cleaners
- Foundries
- Gas stations
- Grain elevators
- Furniture manufacturing
- Metal finishing/plating
- Plastics manufacturing
- Printing/graphic arts
- Sand and gravel plants

### What is an air contaminant source?

An air contaminant source is anything that emits an air pollutant. While this covers many different types of activities, four rules of thumb can often help in identifying an air contaminant source:

1. Something that has a stack, dust collector or vent. Examples include woodworking operations, grinders and storage tanks.
2. A process that uses paints, solvents, adhesives or inks. Examples include paint booths, solvent cleaning tanks and printing presses.
3. A process that burns a fuel (e.g., oil, natural gas or coal). Examples include boilers, furnaces and process heaters.
4. A process that produces visible dust, odors or smoke. Examples include material handling operations, sand blasting, unpaved roadways and incinerators.

### What air permits are required?

The type of air permit most small businesses need is the permit-to-install and operate (PTIO). The PTIO is required before installing and operating an air pollution

source. The PTIO lasts 5 to 10 years and is renewable. Unless it is exempt, you need a PTIO for each air contaminant source at your facility.

### Which air contaminant sources are exempt?

Not all sources of air pollution need a permit. Below are explanations of various permit exemptions contained in Ohio's air pollution regulations:

**"De minimis" air pollution sources (See OAC 3745-15-05)**  
De minimis sources are those that emit less than ten pounds per day of any air contaminant and less than one ton per year (2,000 pounds) of any hazardous air pollutant or combination of hazardous air pollutants. Typically, an emission calculation is required to document whether the *potential emissions* (i.e., as if the source operated at its maximum capacity for 24 hrs/day) or *actual emissions* (at normal operating conditions) are below ten pounds per day. If you claim a de minimis exemption based on actual emissions, you must keep records to document actual daily emissions from the source.

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# Does My Small Business Need an Air Permit?

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## Permanent exemptions (See OAC 3745-31-03(A)(1))

This regulation lists over 45 types of sources that are exempt from permitting. Examples include small boilers, detergent-based parts washers, small storage tanks and other sources having minimal air emissions or meeting certain size criteria.

If you are claiming a de minimis or a permanent exemption, no notification to Ohio EPA is required.

## Permit-by-rule exemption (See OAC 3745-31-03(A)(4))

A permit-by-rule (PBR) exemption is available for eleven categories of low-emitting sources such as gas stations, auto body shops, emergency power generators, and printers. Under the PBR, a business is not required to get a PTIO for the source but must follow all the requirements in the PBR rules, including meeting emission limits, operational restrictions, and recordkeeping and reporting requirements. The PBR requires a simple, one-page notification to Ohio EPA. The company must ensure the air pollution source continually meets all of the PBR requirements. If the air pollution source ceases to comply with the conditions of the PBR, a traditional PTIO is required.

For more information on the de minimis, permanent, and permit-by-rule exemptions, visit [www.epa.ohio.gov/dapc/regs/regs.aspx](http://www.epa.ohio.gov/dapc/regs/regs.aspx).

## How do I get my permit?

If you determine a permit is required, you must complete a permit application and submit it to the Ohio EPA district office or local air agency covering your area. See the map in this fact sheet to determine your local contacts. You can get permit applications from your Ohio EPA district office or local air agency or through the Division of Air Pollution Control (DAPC) Web site at [www.epa.ohio.gov/dapc/permits/permits.aspx](http://www.epa.ohio.gov/dapc/permits/permits.aspx). Air permits will be issued for each source and will usually include emission limits, monitoring, record keeping, and reporting requirements. **Once you get the permit(s), it is very important that you read and understand the terms and conditions.**

### Important

If you are already operating your business and discover that you need air permits, you must still complete and submit a PTIO application.

## What is a general permit?

A general permit is a "template" PTIO available to certain common air pollution sources. General permits are similar to other permits issued by DAPC except that all the permit terms and conditions are set in advance and cannot be changed.

General permits are processed much faster since most of the technical review of the application is eliminated.

General permits are for certain sources that meet qualifying criteria. You can review the qualifying criteria and the terms and conditions of the permit in advance. General permits have streamlined permit applications that require less data than a traditional PTIO application.

Your district office will review the general permit application to confirm that the source qualifies. DAPC expects to issue the general permit within 45 days of receipt of a complete application.

For additional information and a list of available general permits, visit [www.epa.ohio.gov/dapc/genpermit/genpermits.aspx](http://www.epa.ohio.gov/dapc/genpermit/genpermits.aspx).

## Where do I send my permit application?

Ohio EPA has district and local offices throughout the state that handle the permitting process for the businesses in their jurisdiction. To find the office that handles air permitting for your area, refer to the map and contact information at the end of this fact sheet or call Ohio EPA, DAPC at (614) 644-2270.

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## Does My Small Business Need an Air Permit?

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### How long does it take to get a permit?

In general, a PTIO takes anywhere from two to six months to process depending on the complexity of the air pollution source and workloads of the district and central offices. General permits can be processed within 45 days. When submitting your permit application, discuss processing time with your local district office permitting staff.

It is a good idea to arrange a pre-application meeting with your district office to discuss your project. They can ensure you complete the proper forms and can address any concerns you have with construction/installation deadlines.

### How much will my permit cost?

There are no permit application fees. When you receive your PTIO, a one-time fee is charged. You must also pay an annual emissions fee based on the total amount of air pollution emitted by the facility. For a current listing of fees, ask your district office or visit [www.epa.ohio.gov/dapc/permits/permits.aspx#fees](http://www.epa.ohio.gov/dapc/permits/permits.aspx#fees).

### Can I start building or installing equipment while my permit application is being processed?

Ohio's regulations allow some "site preparation activities" before the permit is issued. Smaller companies can clear land, build structures, pour foundations, run utility lines, and place equipment on site before getting the final permit. However, you cannot connect utility lines to the equipment and begin operation until you get the permit.

For a complete list of allowed site preparation activities, see OAC 3745-31-33 or visit [www.epa.ohio.gov/dapc/regs/regs.aspx](http://www.epa.ohio.gov/dapc/regs/regs.aspx).

### Where can I get help?

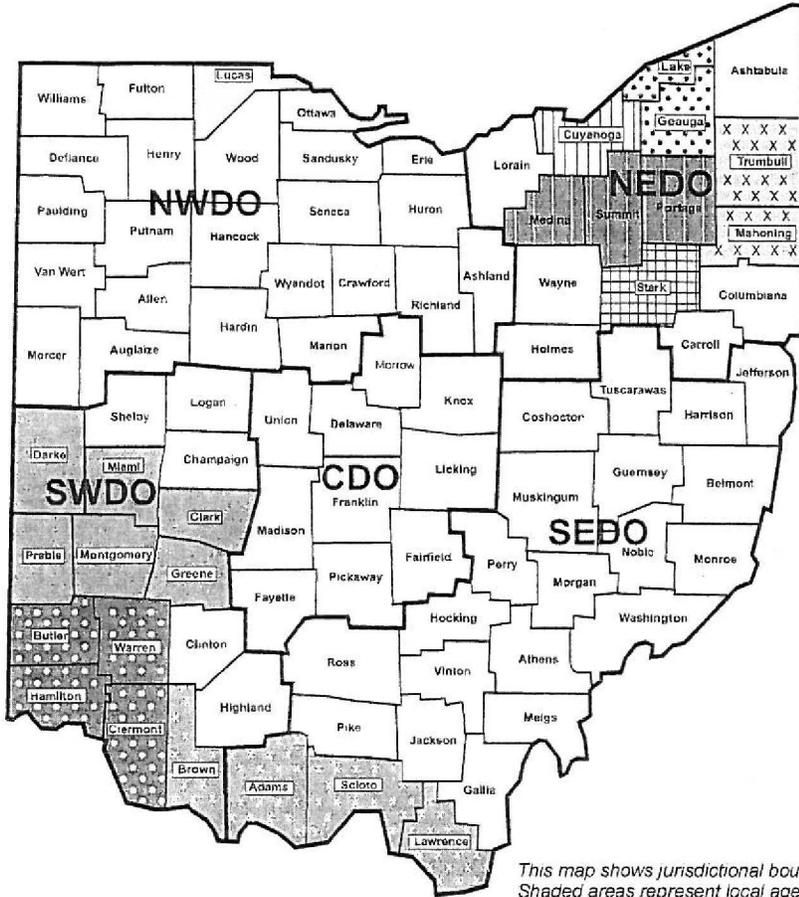
Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is a non-regulatory office of Ohio EPA. A primary goal of OCAPP is to help small businesses comply with air pollution regulations and permitting requirements. If you are operating a small business with fewer than 100 employees and your business is not subject to Title V permitting, we can help you!

We can come to your business to determine exactly what you need to do to comply with air permitting regulations. We can calculate emissions and help you document any permit exemptions for which you may qualify. We can help you complete air permit application forms. All information and services are free. OCAPP does not share information with Ohio EPA inspection and enforcement staff and all air permitting-related information is confidential. For more information, contact OCAPP at (800) 329-7518, or visit our Web site at [www.epa.ohio.gov/ocapp](http://www.epa.ohio.gov/ocapp).

Ohio EPA recommends that all businesses investigate ways to reduce pollution and conserve energy. This can save you money and may reduce the amount of regulations that affect your business. Contact OCAPP for help in identifying pollution prevention (P2) opportunities for your business.

# Does My Small Business Need an Air Permit?

## Ohio EPA District Offices and Local Air Pollution Control Agencies



This map shows jurisdictional boundaries.  
Shaded areas represent local agencies within Ohio EPA districts.



### District Offices

**CDO** Central District Office  
50 West Town Street, Suite 700  
Columbus, OH 43215  
(614) 728-3778 FAX (614) 728-3898

**SEDO** Southeast District Office  
2195 Front St.  
Logan, OH 43138  
(740) 385-8501 FAX (740) 385-6490

**NEDO** Northeast District Office  
2110 E. Aurora Rd.  
Twinsburg, OH 44087  
(330) 425-9171 FAX (330) 487-0769

**NWDO** Northwest District Office  
347 North Dunbridge Rd.  
Bowling Green, OH 43402  
(419) 352-8461 FAX (419) 352-8468

**SWDO** Southwest District Office  
401 E. Fifth St.  
Dayton, OH 45402-2911  
(937) 285-6357 FAX (937) 285-6249

### Local Air Pollution Control Agencies

 **Akron Regional Air Quality Management District**  
146 South High St., Room 904  
Akron, Ohio 44308  
(330) 375-2480 FAX (330) 375-2402

 **Cleveland Dept. of Public Health Division of Air Quality**  
75 Erievue Plaza, 2nd Floor  
Cleveland, Ohio 44114  
(216) 664-2297 FAX (216) 420-8047

 **Portsmouth Local Air Agency**  
605 Washington St., Third Floor  
Portsmouth, Ohio 45662  
(740) 353-5156 FAX (740) 353-3638

 **Air Pollution Control Division Canton City Health Dept.**  
420 Market Ave. North  
Canton, Ohio 44702-1544  
(330) 489-3385 FAX (330) 489-3335

 **Regional Air Pollution Control Agency Montgomery County Health Dept.**  
117 South Main St.  
Dayton, Ohio 45422-1280  
(937) 225-4435 FAX (937) 225-3486

 **City of Toledo Division of Environmental Services**  
348 South Erie Street  
Toledo, Ohio 43604  
(419) 936-3015 FAX (419) 936-3959

 **Dept. of Environmental Services Air Quality Programs**  
250 William Howard Taft Road  
Cincinnati, Ohio 45219-2660  
(513) 946-7777 FAX (513) 946-7778

 **Lake County General Health District Air Pollution Control \***  
33 Mill Street  
Painesville, Ohio 44077  
(440) 350-2543 FAX (440) 350-2548

 **Mahoning-Trumbull APC Agency \***  
345 Oak Hill Ave., Suite 200  
Youngstown, Ohio 44502  
(330) 743-3333 FAX (330) 744-1928

\*Facilities located within these jurisdictions should file air permit applications with Ohio EPA's Northeast District Office (NEDO)

# Alternative Waste Management Project Request

The Integrated Alternative Waste Management Program (IAWMP) is used to approve alternative waste disposal projects pursuant to OAC 3745-27-05(A)(4). Ohio EPA regulates the disposal of solid waste. Incorporation of appropriate waste material into the manufacture of a final product is not considered disposal, and therefore not regulated by the agency. Contact your district office for more information.

## REQUESTOR INFORMATION

Name: \_\_\_\_\_ Company (If applicable): \_\_\_\_\_  
Street address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_ Alternative contact person: \_\_\_\_\_

## GENERATOR INFORMATION

Name: \_\_\_\_\_ Company (If applicable): \_\_\_\_\_  
Street address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_ Alternative contact person: \_\_\_\_\_

*If the generator is different than the requestor, attach generator's written consent to use the waste in this project. Also attach statement from generator describing efforts to minimize waste generation.*

## PROPERTY OWNER INFORMATION

Name: \_\_\_\_\_ Company (If applicable): \_\_\_\_\_  
Street address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_  
Phone: \_\_\_\_\_ Email: \_\_\_\_\_ Alternative contact person: \_\_\_\_\_

*If the property owner is different than the requestor, attach written consent of the property owner to dispose of solid waste at this location. List multiple property owners on a separate sheet.*

## WASTE CHARACTERIZATION

Non-toxic fly ash     Non-toxic bottom ash     Non-toxic, spent foundry sand     Other

Other waste description: \_\_\_\_\_

Description of physical and chemical characteristics attached:

Material safety data sheets     TCLP test results     Lab reports     Other

*The generator shall attach a certification that the analysis is true, accurate and representative of the solid waste.*

## PROJECT INFORMATION

Project location: \_\_\_\_\_  
Describe proposed use of waste material in this project: \_\_\_\_\_

*Attach contingency plan for disposal of any solid waste brought to project site that cannot be used.*

Anticipated start date of construction: \_\_\_\_\_ Estimated completion date: \_\_\_\_\_

Describe use of waste in other IAWMP projects (if known): \_\_\_\_\_

Estimated volume of waste in this project: \_\_\_\_\_ Rate of disposal: \_\_\_\_\_

Method(s) of application for land application requests: \_\_\_\_\_

*Attach plan drawing of the proposed limits for solid waste disposal.*

## CERTIFICATION

I have personally examined all information and attachments in this project request and all of the information submitted is true and accurate to the best of my knowledge.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

**Upon review of this request the Ohio EPA district office may require additional narratives, plan drawings, and/or detailed engineering plans. Examples include, but may not be limited to, the following information:**

A flow diagram and narrative describing the process producing the waste

Location and limits of project site and all waste storage areas

*(If this project is at a solid waste facility this could include plan view drawings identifying footprint of existing waste, proposed locations of waste placement in this project, and all waste storage areas)*

Hydrogeologic characterization

Location and limits of regulatory floodplain

Existing topography showing adjacent lakes, streams, wetlands, springs, or other surface waters

Depth to the upper-most aquifer and lowest elevation of waste placement

Aquifer boundaries declared by the U.S. government under the Safe Drinking Water Act to be a sole source aquifer

Limits of any unconsolidated aquifer systems delineated on the Ohio Department of Natural Resources (ODNR) ground water resource maps as yielding at least 100 gallons per minute

Ohio EPA endorsed wellhead protection area or any public or private water supply well

Stormwater run-on/run-off control measures

Total acreage of project site and boring logs for large volume land application projects

A list of the permits, licenses, plan approvals, authorizations or other approvals that have been applied for and the local, state, or federal office where application has been made

Location and boundaries of any natural areas listed below:

- National parks or national recreation areas and state parks or state recreation areas;
- Areas listed by ODNR as a state nature preserve, state wildlife area, or state scenic river;
- Areas designated, owned, and managed by the Ohio Historical Society as a nature preserve;
- Areas designated by the U.S. Department of Interior as a national wildlife refuge or national scenic river;
- Areas designated by the U.S. Forest Service as a special interest area or a natural research area in the Wayne National Forest;
- Stream segments designated by the Ohio EPA as a state resource water a coldwater habitat, or an exceptional warmwater habitat.

**OHIO EPA DISTRICT OFFICES**

Central District Office 3232 Alum Creek Drive Columbus, OH 43207 (614) 728-3778	Northeast District Office 2110 E. Aurora Rd. Twinsburg, OH 44087 (330) 963-1200	Northwest District Office 347 North Dunbridge Rd. Bowling Green, OH 43402 (419) 352-8461	Southeast District Office 2195 Front Street Logan, OH 43138 (740) 385-8501	Southwest District Office 401 East Fifth Street Dayton, OH 45402 (937) 285-6357
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**MORE INFORMATION ABOUT IAWMP**

[www.epa.state.oh.us](http://www.epa.state.oh.us)

Document No. 0529 - Division of Solid and Infectious Waste Management - IAWMP - Division of Labor

Document No. 0609 - Evaluating Exempt Waste Uses at Solid Waste Facilities

Document No. 0630 - Issuing Exemptions from Collecting and Remitting the State Disposal Fee and SWMD Surcharges...

FOR OHIO EPA USE ONLY					
Please route the IAWMP Project Request to the following Divisions. Each Division should note whether there are comments on the request, or if additional information is required (attach information requirements). The individual providing the lead review should be noted and all correspondence returned to that individual.					
Lead reviewer:			Division:		
<b>DSIWM</b>		No comment		Comments attached	Need information
<b>DSW</b>		No comment		Comments attached	Need information
<b>DDAGW</b>		No comment		Comments attached	Need information

**Ohio EPA  
Information Request Form**

Office of Compliance Assistance and  
Pollution Prevention

Name \_\_\_\_\_

Title \_\_\_\_\_

Company/Organization \_\_\_\_\_

\_\_\_\_\_

Street Address \_\_\_\_\_

\_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_

Zip \_\_\_\_\_

Phone \_\_\_\_\_

E-mail \_\_\_\_\_

I'm interested in receiving an on-site  
compliance assessment.

I'm interested in receiving an on-site pollution  
prevention assessment.

Please add my name to your electronic  
newsletter mailing list.

**Please return by mail to:**

Ohio EPA, Office of Compliance Assistance and  
Pollution Prevention  
P.O. Box 1049, Columbus, Ohio 43216-1049  
or fax us at (614) 644-2807

**OCAPP Testimonials**

Many businesses that have worked with us have  
said that they were glad they contacted OCAPP  
and received assistance. Some examples are:

*"Thanks so much for the quick response! I  
appreciate your help!"*

-An Automotive Parts Manufacturer

*"Thanks very much gentlemen. This looks like a  
"ton" of useful information that we can look into.  
This will certainly take some time but be assured  
I will investigate some of these possibilities over  
time. Again, great information and I appreciate all  
of your time and efforts."*

-A Paint Manufacturer

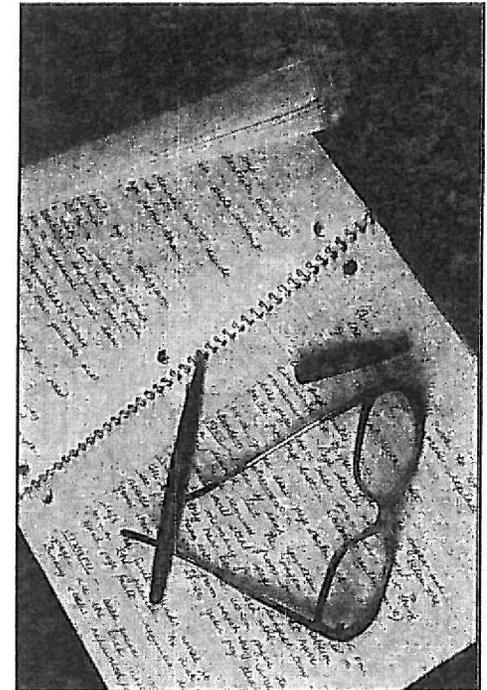
*"I cannot express to you our gratitude for having  
someone help us fill out these forms. With  
sincere regards, we feel you have an exceptional  
OCAPP employee."*

-A Stone Products Company

*"The timeliness of your presentation was excellent  
and your detailed discussion on the RACT rule  
and the impact (or potential impact) on them was  
very clear and concise. I also had several  
comments from members about your description  
of available EPA services."*

-A Regional Printing Association

## Need Help with Environmental Regulations?



**Ohio EPA's Office of Compliance  
Assistance and Pollution Prevention**

A free resource for Ohio business owners who  
need help with EPA regulations and pollution  
prevention.

## **What is Ohio EPA's Office of Compliance Assistance and Pollution Prevention?**

The Office of Compliance Assistance and Pollution Prevention (OCAPP) is a one-stop location for answers and information about environmental regulations, compliance concerns and pollution prevention. All services of the office are FREE. OCAPP is an independent, non-regulatory office within Ohio EPA. This means that information obtained WILL NOT be shared with Ohio EPA inspection and enforcement staff.

## **What services does OCAPP offer?**

Our qualified environmental specialists can answer your questions regarding air, waste, water and other EPA requirements and help businesses find ways to reduce waste and save money. The office provides:

- toll-free telephone hotline;
- on-site compliance assessments;
- on-site pollution prevention assessments;
- Internet Web site with up-to-date information;
- assistance with permit applications and forms;
- environmental workshops; and
- a quarterly newsletter and other easy-to-understand publications

## **How much do OCAPP's services cost?**

OCAPP's services are free.

## **Who is eligible to receive assistance from OCAPP?**

Any business in Ohio can receive compliance and pollution prevention assistance. However, on-site compliance assessments are limited to businesses with fewer than 100 employees, while all businesses are eligible for pollution prevention on-site assessments.

## **Will Ohio EPA's enforcement program know that I called OCAPP?**

No, information obtained by the office is not shared with Ohio EPA inspection or enforcement staff.

## **What types of small businesses are subject to environmental regulations and can benefit from pollution prevention?**

- Auto service/collision repair
- Contractors
- Painting/coating operations
- Manufacturing companies
- Dry cleaners/laundries
- Power washers
- Carpet cleaners
- Bakeries
- Printers
- Furniture makers/wood refinishers
- HVAC service
- Metal finishing/fabrication
- Construction
- Service stations
- and many others

## **What are the benefits of using OCAPP?**

- Be better informed about the regulations.
- Help reduce liability and potential for penalties.
- Protect worker health and safety.
- Find ways to reduce pollution and costs.
- Protect the environment.

## **Contact Information**

Ohio EPA  
Office of Compliance Assistance and  
Pollution Prevention  
P.O. Box 1049  
Columbus, Ohio 43216-1049

For a list of OCAPP contact names and phone numbers, visit  
[www.epa.ohio.gov/ocapp/sb/index.aspx](http://www.epa.ohio.gov/ocapp/sb/index.aspx)

(800) 329-7518 or (614) 644-3469

(614) 644-2807 fax

Hotline and office hours:

Monday through Friday 8 a.m. - 5 p.m.

[www.epa.ohio.gov/ocapp](http://www.epa.ohio.gov/ocapp)

by Pam Allen

In December 2005, Ohio EPA launched a frequently asked questions Web tool known as the Answer Place. The Answer Place provides quick, easy access to information and allows you to pose questions directly to Agency staff. The development of this site is one of the ways Ohio EPA is working toward achieving Director Koncelik's goal of improving the Agency's compliance assistance efforts.

You can access the Answer Place by clicking on the logo from Ohio EPA's main Web page. Once you arrive at the site, you will notice that there are many questions and answers already in the system, searchable by keyword. If you cannot find the information you are looking for in the existing data, you can use the "Ask a Question" feature to pose a question. When you submit your question, it is forwarded to the appropriate Ohio EPA staff for a response. Another feature of the Answer Place is the ability to create a personal login, which allows customers to track questions they've viewed or submitted and to get automatic e-mail updates if a particular question/issue of interest is updated.

Ohio EPA will keep updating the Answer Place with new information as we get frequent questions from our customers. If you have questions about environmental requirements, we encourage you to stop by the Answer Place.

#### **Answer Place**

Have questions?  
Need help?  
Click here to visit  
the Answer Place.

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## Solvent-Contaminated Rags and Wipers

by Harry Sarvis

Over the past several years, the Division of Hazardous Waste Management has had a written policy on the management of solvent-contaminated rags and wipers. In the policy, we indicated that rags or wipers that are contaminated with a solvent constituent that is a listed hazardous waste solvent (F001 through F005) must be regulated as a listed hazardous waste when disposed of regardless of how the solvent got on the rag or wiper.

As part of our periodic policy review as required by state law, we recently reviewed this policy and concluded that rags and wipers contaminated with a listed solvent constituent do not fall within the listing description for spent solvents. As a result, we have rescinded the policy. Solvent-contaminated rags and wipers which are contaminated with listed solvent constituents are not considered listed hazardous waste except in situations where the rag or wiper is used to clean up a spill of a used solvent that is a listed hazardous waste; those rags or wipers become a listed hazardous waste.

Even though the Division of Hazardous Waste Management no longer considers solvent-contaminated rags and wipers as being listed hazardous waste, if you generate solvent-contaminated rags or wipers, and do not have them laundered, you will still need to evaluate this waste stream to determine whether they would be a characteristic hazardous waste for purposes of storage, transportation, and disposal.

If you have the rags or wipers laundered, they would not be regulated. The rags or wipers cannot contain free liquids and they must be sent to a commercial laundry which is subject to regulation under the Clean Water Act or a dry cleaner for cleaning and reuse.

If you have any questions, please feel free to contact our staff in the regulatory services unit at (614) 644-2917.