



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

**RE: Post Printing Co
OHR 000 153 106
Auglaize County
DHWM, NWDO
Return to Compliance**

September 17, 2009

Mr. Dan Schmiesing
Post Printing Co
P.O. Box 101
Minster, Ohio 45865

Dear Mr. Schmiesing:

Thank you for sending the documentation in response to the Ohio Environmental Protection Agency's (Ohio EPA's) Notice of Violation (NOV) dated July 30, 2009. The documentation was received by Ohio EPA on September 9, 2009, and includes a map, photographs, and a page from Post Printing Co's (PPC's) inspection log.

After review of the submitted material, PPC will remain a small quantity generator of hazardous waste and a generator of used oil and universal waste lamps.

My review of the submitted information reveals that PPC has abated all violations discovered during the July 16, 2009, compliance evaluation inspection as outlined below.

Violations:

1. **Ohio Administrative Code (OAC) Rule 3745-52-34(D)(5)(b), Accumulation time of hazardous waste:** "The generator must post the following information next to the telephone: (i) The name and telephone number of the emergency coordinator; (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm(s); and (iii) The telephone number of the fire department, unless the facility has a direct alarm."

PPC failed to post the following information next to the telephones: location of fire extinguishers and spill control material, and, if present, fire alarm(s).

On September 9, 2009, Ohio EPA received a map PPC will use showing the location of the fire extinguishers, spill control material, and fire alarms in the plant. PPC also stated that a copy of this map has been placed next to the phones in the plant.

Therefore, this violation is considered abated on September 9, 2009.

2. **OAC Rule 3745-52-34(C)(1)(b), Accumulation time of hazardous waste:**

"A generator may accumulate as much as fifty-five gallons of hazardous waste... at or near any point of generation... provided he... (b) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers."

PPC failed to mark the satellite accumulation area containers located next to the printing machines with the words "Hazardous Waste" or with other words that identify the contents of the containers.

On September 9, 2009, Ohio EPA received photographic documentation that the satellite accumulation area containers have been properly labeled.

Therefore, this violation is considered abated on September 9, 2009.

3. **OAC Rule 3745-66-74, Inspections:** "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary."

PPC failed to record the inspections of the less than 180 day hazardous waste storage area in an inspection log or summary.

On September 9, 2009, Ohio EPA received documentation including four consecutive weeks of inspections for the less than 180 day storage area.

Therefore, this violation is considered abated on September 9, 2009.

4. **OAC Rule 3745-279-22 (C)(1), Used oil storage requirements for generators:**

"Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words 'Used Oil'".

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PPC failed to mark two 55 gallon used oil drums located in the storage room with the words "Used Oil."

This violation was abated on July 16, 2009.

General Concerns:

- A. **Phone Information:** Although PPC had the name and telephone number of the emergency coordinator and the telephone number of the local fire department next to the phone inside the plant, this information did not stand out amongst the other information located by the phone. In the event of an emergency, PPC will need to contact both numbers immediately. Therefore, this information should stand out and be easily located.

This general concern serves as a reminder to PPC and is considered addressed per the July 30, 2009, NOV.

- B. **Emergency Equipment Inspections:** PPC is tracking emergency equipment inspections. However, it may be advantageous for PPC to keep all emergency equipment inspections in one all encompassing log.

This general concern serves as a reminder to PPC and is considered addressed per the July 30, 2009, NOV.

- C. **Accumulation Start Date:** PPC has one storage area for hazardous waste. In this area PPC has both full drums of hazardous waste waiting to be shipped off site and partial drums of hazardous waste that are still accumulating waste. PPC should put two dates on each drum in order to easily track accumulation. The first date should be the date that waste is first placed in the drum. The second date should be the date that the drum is considered full and ready to be shipped off site.

This general concern serves as a reminder to PPC and is considered addressed per the July 30, 2009, NOV.

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Should you have any questions, please feel free to call me at (419) 373-3065.

Sincerely,

Kara Reynolds

Kara Reynolds
Environmental Specialist
Division of Hazardous Waste Management

/lb

pc: Colleen Weaver, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO

~~DHWM, NWDO Auglaize County File: Post-Printing Co, 340 West
Industrial Dr, Minster~~

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.