



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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: Wapakoneta Machine Company
Auglaize County
OHD987046489
Hazardous Waste
Return to Compliance

June 27, 2008

Mr. Lee Vaubel, Maintenance Supervisor
Wapakoneta Machine Company
300 North Street
P.O. Box 429
Wapakoneta, Ohio 45895

Dear Mr. Vaubel:

Thank you for your May 30, 2008, response to Ohio EPA's May 14, 2008, Notice of Violation letter. My review of this documentation reveals that Wapakoneta Machine Company (WMC) has adequately demonstrated abatement of all of the violations discovered during the May 1, 2008, compliance evaluation inspection.

The following is a summary of the violations cited and your compliance with respect to each:

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, WMC did not have waste evaluation documentation for the spent filter paper generated when drying the grinding swarf. WMC has historically disposed of this spent material as a non-hazardous waste. WMC must immediately cease disposing of the spent filter paper as non-hazardous waste until a proper waste evaluation has been completed.

WMC must obtain a representative sample of the spent grinding swarf filter paper and have it analyzed for Toxic Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery Act (RCRA) metals (SW-846 Method 1311/6010).

On May 30, 2008, WMC submitted a copy of the analytical results, along with a copy of the chain of custody, for the spent grinding swarf filter paper. The submitted analytical results indicate that the spent filter paper is a non-hazardous waste. The spent filter paper may be managed as a solid waste.

- b. WMC also 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. At the time of the inspection I gave you a copy of the guidance document: Fluorescent Lamps: What You Should Know. I recommend that you review this document and contact me if you have any questions.

WMC must submit to Ohio EPA documentation to demonstrate how you plan to properly manage your fluorescent bulbs. If WMC decides to conduct waste sampling, please notify me at least seven days prior to the sampling event date, so that a representative from Ohio EPA can be present to observe the sampling and to split samples if necessary.

If WMC plans to manage the spent fluorescent bulbs as universal waste, please submit photographic documentation showing the storage containers properly closed, labeled, and dated. WMC must also properly train employees, who handle or have responsibility for managing universal waste, on waste handling and emergency procedures relative to their responsibilities. In addition, WMC must submit the name of the facility where you plan to recycle the bulbs.

On May 30, 2008, WMC submitted a copy of the spent lamp recycling information given to them from Greve Electric. Greve Electric takes the spent bulbs with them once they are changed and delivers them to Dickman Supply. Dickman Supply ships the spent bulbs to Lighting Resources, Inc. located in Indianapolis, Indiana, for recycling.

With this information, this violation is considered abated.

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."

WMC had thirteen (13) 55-gallon drums of used oil located in the storage dock area that were not properly labeled.

WMC properly labeled the thirteen (13) 55-gallon drums with the words "used oil" at the time of our inspection.

Therefore, this violation is considered abated.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Hazardous Waste Management

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pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO-Auglaize County General File~~
ec: Melissa Boyers, DHWM, NWDO

Notice:

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