



Environmental  
Protection Agency

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

Re: Maumee Assembly & Stamping  
OHD068089796  
Lucas County  
Hazardous Waste  
**Partial Return to Compliance**

August 12, 2011

Mr. Allan George, Operations Manager  
Maumee Assembly & Stamping  
920 Illinois Avenue  
Maumee, Ohio 43537

Dear Mr. George:

On July 10, 2010, Maumee Assembly & Stamping (MAS) was found responsible for a release of at least 200 gallons of used oil to Heilman Ditch, a waterway in Maumee, Ohio. The used oil flowed downstream into waters of Toledo, Ohio. On July 22, 2010, Ohio EPA conducted a compliance evaluation inspection of MAS, located at 920 Illinois Avenue in Maumee, Ohio. Fifteen violations of Ohio's hazardous waste laws were observed and cited in a Notice of Violation letter (NOV) dated August 19, 2010. Ohio EPA received responses from MAS on September 15, September 20, September 21, September 22, September 23, September 24, September 29, and October 11, 2010. I conducted a follow-up inspection on September 24, 2010, to observe sampling of the used oil tanks and other operations at MAS. Ohio EPA responded in a Partial Return to Compliance (PRTC) letter dated June 1, 2011. MAS provided a written response to Ohio EPA's June 1, 2011, PRTC, on July 5, 2011.

At the time of the July 22, 2010, inspection, MAS appeared to be acting as a conditionally exempt small quantity generator. MAS was generating the following wastes:

1. Used Oil:

**In your July 5, 2011, response letter you explain that the drums of used oil are labeled with the word "Used Oil" and that you are talking with Waste Management and ARR about recycling the used oil. Therefore, no further information is needed at this time.**

2. Aerosol Cans (D001)
3. Spent Parts Washer Solvent (D001)
4. Universal Waste Lamps
5. Universal Waste Batteries

Below is a summary of the violations cited in Ohio EPA's August 19, 2010, NOV and your compliance status with respect to each. Please respond with all necessary information within 30 days of receipt of this letter.

**1. Waste Evaluation**  
**OAC Rule 3745-52-11**

A. Catch Basin Waste: The waste collected from the catch basin, as a result of the used oil release to the environment, must be evaluated, through sampling and analysis, for hazardous waste characteristics.

The analyses already performed represents this waste, which was determined to be non-hazardous.

B. Waste from Waterway: The waste collected from the ditch and any other waterway, as a result of the used oil release to the environment, must be evaluated for hazardous waste characteristics.

The analyses already performed represents this waste, which was determined to be non-hazardous.

C. Duck Cleaning Waste: The waste from cleaning oil soaked ducks must be evaluated for hazardous waste characteristics.

The analyses already performed represents this waste, which was determined to be non-hazardous.

D. Steam Clean Booth Waste: The waste from the steam clean booth must be evaluated, through sampling and analysis, for hazardous waste characteristics.

This waste was sampled and the sample was analyzed for TCLP metals.

E. Floor Washer Waste: The waste from the floor washers must be evaluated, through sampling and analysis, for hazardous waste characteristics.

This waste was sampled and the sample was analyzed for TCLP metals.

F. Used Oil: MAS has caused the release of used oil to the environment. Therefore, in order to evaluate certain contaminated media collected in response to the release, MAS should obtain a representative sample of its used oil and have it analyzed for TCLP metals.

Ohio EPA has determined that the wastes A through F, listed above, do not possess a characteristic of hazardous waste. No further analyses are necessary at this time.

MAS was required to submit a copy(s) of the shipping paper(s) used to transport all the waste, listed above in violation number one, to an off-site facility.

**Attached to your July 5, 2011, response letter are copies of manifests 002757412, 002757413, 003270776, 003270851, 003270927 and 003270928 documenting the off-site shipment of non-hazardous used oil to Advanced Resource Recovery of Inkster, Michigan. Also attached to your response letter is a copy of non-hazardous waste manifest 259003 documenting the off-site shipment of used oil solids to Evergreen Recycling and Disposal Facility. Therefore, these violations of OAC Rule 3745-52-11 were abated on July 5, 2011.**

**2. Used Oil Container Labeling  
OAC Rule 3745-279-22(C)(1)**

Ohio EPA acknowledges that it received photographs of the three tanks on October 15, 2010, in an email message from you and that the photos document that the tanks had been properly labeled with the words "Used Oil".

Attached to your July 5, 2011, response letter is a photo of the drum that was used to accumulate the used oil I observed in two pails inside the tank shelter on September 24, 2010. The drum is properly labeled with the words "Used Oil". Therefore, this violation was abated on July 5, 2011.

**3. Used Oil – Condition of Units  
OAC Rule 3745-279-22(B)**

On July 10, 2010, MAS was found responsible for a release of used oil to Heilman Ditch, a waterway in Maumee, Ohio. Therefore, there are structural defects in the used oil handling system that allowed used oil to leak or be released, and these must be found and repaired. In order to correct this violation, MAS was required to follow the requirements listed below, for Violation #4.

**In your July 5, 2011, response letter you state that the repair of the crossover pipe was completed on September 30, 2010. MAS has provided their explanation of how the used oil entered Heilman Ditch and how various repairs and modifications have fixed the used oil handling system.**

However, Ohio EPA is not satisfied with the explanation provided and is not certain that the repairs are sufficient. Therefore, it appears that a professional engineer is necessary to certify that the used oil handling system (all of its components) are capable of preventing a release of used oil to the environment. Please inform Ohio EPA when MAS will have a professional engineer evaluate the used oil system, so that an inspector may be present to observe. Please provide a report from a professional engineer within 30 days of receipt of this letter. The report should explain either that the system is sufficient to prevent a release of used oil to the environment or that repairs or modification are necessary.

**4. Response to Releases of Used Oil  
OAC Rule 3745-279-22(D)**

Upon detection of a release of used oil to the environment a generator shall perform the following cleanup steps: stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials, and if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

On July 10, 2010, MAS was found responsible for a release of used oil to Heilman Ditch, a waterway in Maumee, Ohio. The used oil flowed downstream into waters of Toledo, Ohio. The used oil on the waterway has been cleaned up. However, in order to correct this violation, MAS was required to do the following:

1. Clearly demonstrate how the used oil escaped from its used oil tank farm or some other source.
2. Repair the tank system in a manner that will prevent another release to the environment including into the storm sewers.
3. Evaluate the condition of the basement to determine if used oil can escape (since ground water can enter).

**In your July 5, 2011, response letter you explain that the sump pump in the containment dike was repaired on August 15, 2010, and that the dike was sealed on August 23, 2010. You also explained that a float system was installed on the rain water sump pump in the basement of the facility on January 23, 2011, so that if the used oil sump pump failed and the basement filled with used oil, the rain water sump pump would shut off and prevent used oil from entering the storm sewer.**

Ohio EPA is not satisfied with the explanation provided and is not certain that the repairs are sufficient. Therefore, it appears that a professional engineer is necessary to certify that the used oil handling system (all of its components) are capable of preventing a release of used oil to the environment. Please inform Ohio EPA when MAS will have a professional engineer evaluate the used oil system, so that an inspector may be present to observe. Please provide a report from a professional engineer within 30 days of receipt of this letter. The report should explain either that the system is sufficient to prevent a release of used oil to the environment or that repairs or modification are necessary.

5. **Universal Waste Packaging - Lamps**  
**OAC Rule 3745-273-13(D)(1)**

This violation was abated on September 20, 2010.

6. **Universal Waste Labeling - Lamps**  
**OAC Rule 3745-273-14(E)**

This violation was abated on September 20, 2010.

7. **Accumulation Time for Universal Waste - Lamps**  
**OAC Rule 3745-273-15(C)**

This violation was abated on September 20, 2010.

8. **Universal Waste Employee Training**  
**OAC Rule 3745-273-16**

Attached to your July 5, 2011, response letter is a copy of your Single Point Lesson #19 regarding the accumulation of universal waste lamps and batteries. This SPL was revised to include statements that each universal waste battery will be marked with the accumulation start date; and that each container of universal waste spent lamps will be kept closed, labeled with the words "Universal Waste Lamps" and the accumulation start date. You explained that training regarding this revised SPL was provided to employees on June 27, 2011. Attached to your July 5, 2011, response letter are copies of the training sign in sheets documenting that thirty six employees received this training. Therefore, this violation was abated on July 5, 2011.

9. **Universal Waste Labeling - Batteries**  
**OAC Rule 3745-273-14(A)**

Mr. Allan George, Operations Manager  
August 12, 2011  
Page 6

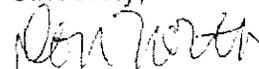
This violation was abated on September 20, 2010.

**10. Accumulation Time for Universal Waste - Batteries  
OAC Rule 3745-273-15(C)**

This violation was abated on September 20, 2010.

If you have any questions, please feel free to contact me at (419) 373-3074.

Sincerely,



Don North  
District Representative  
Division of Materials and Waste Management

/llr

pc: Colleen Weaver, DMWM, NWDO  
Cindy Lohrbach, DMWM, NWDO  
DMWM-HW, NWDO, Lucas County, Maumee Assembly & Stamping File  
(Former Ford Stamping Plant)  
ec: Don North, DMWM, NWDO

**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.