



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

June 1, 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.

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: There is a fine film of light mill oil on the incoming steel. This is all the oil that is needed for pressing. No additional oil is used on the press dies. Used press machine oil and hydraulic oil is generated. Used oil filters from the presses are drained into drums. Used oil is also generated in the maintenance shop and accumulated in a 55-gallon drum. Automotive oil filters are drained into a drum. Please explain how the used oil accumulated in drums is managed.

During my September 24, 2010, follow-up inspection, you explained that four tanker trucks of used oil from the tank farm had already been shipped from the facility. In your September 20, 2010, email message you explain that the used oil in a 55-gallon drum in the pressroom and one in the truck shop will be recycled when an approved recycler has been identified.

At the time of my September 24, 2010, follow-up inspection no recycler had been identified. MAS must explain how it has managed this used oil.

2. Aerosol Cans (D001): These are cans of spray paint and lubricants that are not emptied and cannot be emptied because they are broken. They are accumulated in a satellite accumulation drum.
3. Spent Parts Washer Solvent (D001): Mineral spirits is used in a small parts washer of approximately 20 gallons. MAS started using this parts washer at the beginning of July 2010. MAS has not yet generated any spent solvent from the unit. MAS anticipates no more than one drum of this waste per year.
4. Universal Waste Lamps: MAS accumulates 4 and 8 foot fluorescent lamps and HID lamps. MAS has not yet identified a recycler for these lamps.
5. Universal Waste Batteries: Spent lead-acid batteries from vehicles are recycled through Gross Alternator & Starter Service in Toledo.

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 within 30 days of your receipt of this letter.

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

A generator must determine whether its waste is hazardous by first determining if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35; by testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24; or by applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used. MAS had not adequately evaluated all of its waste properly. Specifically, the following wastes have not been properly evaluated:

- 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.

On September 24, 2010, I returned to MAS to observe sampling of the used oil tanks. The waste which C&W collected in a vac truck from the catch basin was pumped into the used oil tanks.

MAS determined that the used oil in the west tank would be most representative of the waste from the catch basin.

The specific waste could not be sampled since it was mixed with the waste in the tank farm. However, the oil (top layer) and water (bottom layer) of each of the three tanks was sampled. These tanks appear to be the source of the used oil release. Therefore, their analyses should represent this waste.

- 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.

On September 24, 2010, I returned to MAS to observe sampling of the used oil tanks. The used oil which C&W collected in vac trucks from the waterway was pumped into the used oil tanks. MAS had also accumulated a dumpster of used booms, from cleanup of the ditch. It was stored by the tank farm. These booms could have been sampled, if necessary, if the results from sampling and analyzing the used oil tanks were not representative of this waste.

The specific used oil waste could not be sampled since it was mixed with the waste in the tank farm. However, the oil (top layer) and water (bottom layer) of each of the three tanks was sampled. These tanks appear to be the source of the used oil release. Therefore, their analyses should represent this waste.

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

The ducks were cleaned with Ultra Dawn. Attached to an email dated September 22, 2010, is a copy of the MSDS for the Ultra Dawn. This material contains up to 5% ethyl alcohol and the flash point is 115-135 °F.

However, this detergent was diluted in water for washing the ducks. The wash waters were returned to the plant. MAS decided to sample and analyze the most concentrated oil in the tank system and use the results to evaluate this waste, which contained a small amount of used oil from cleaning the oil soaked ducks.

- D. Steam Clean Booth Waste: The waste from the steam clean booth must be evaluated, through sampling and analysis, for hazardous waste characteristics. MAS should describe any cleaning compound used in the steam clean booth and submit a MSDS for the compound.

Attached to an email dated September 22, 2010, is a copy of the MSDS for Red Giant 900. This is the cleaning compound used in the steam clean booth. The pH of the concentrate is 12.5, but the material is diluted in water. Attached to an email message to Ohio EPA, dated September 23, 2010, is a copy of an analytical result for Red Giant 900. The analysis is inconclusive.

On September 24, 2010, MAS plugged the drain in the steam clean department and while cleaning a die, collected a sample for analysis. 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. MAS should describe any cleaning compound used in the floor cleaners and submit a MSDS for the compound.

On September 24, 2010, I observed the sampling of two floor washing units in the basement of the facility. The waste 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.

On September 15, 2010, you submitted a sampling plan based on our conversations. I concurred with your plan and suggested more sampling containers, at least twelve, in an email dated September 15, 2010.

Attached to an email dated September 21, 2010, are copies of two Inbound Load Notifications from Advanced Resource Recovery, L.L.C. (ARR). These notifications document the shipment of 12,000 gallons of used oil from the tank farm on September 15, 2010.

The used oil was removed from the tank farm for shipment by ARR, before the sampling event on September 24, 2010, since MAS was concerned about the forecast of heavy rain that might have overflowed the tank farm system. According to you, by removing this used oil, MAS made room for additional rain water in the tank system.

On September 24, 2010, I returned to MAS to observe sampling of the three used oil tanks. MAS had samples collected from the top and bottom of each of the three tanks. The oil samples from the top of each tank were analyzed for TCLP metals, TCLP VOCs and flash point. The water samples from the bottom of each tank were analyzed for TCLP metals.

On October 11, 2010, I received a copy of the analytical summary for the samples collected on September 24, 2010. The summary documents that no TCLP VOCs, in the waste oil layer (in the top of each tank), were detected in any of the waste samples. The flash point of the waste oil layer in the top of each tank was above 160°F in every case, and except for 0.02 mg/L of TCLP cadmium detected in the steam clean booth waste, no other TCLP metals were detected in any sample. Therefore, 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 must 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.

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

Containers, aboveground tanks, and fill pipes for underground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." On July 22, 2010, I observed two 20,000 gallon tanks and one 10,000 gallon tank in the tank farm, one 55-gallon drum in the Truck Shop and one 55-gallon drum in the plant for draining press oil filters that were not labeled with the words "Used Oil".

In order to correct this violation, MAS was required to immediately mark or label all used oil tanks and containers at the facility, with the words "Used Oil" and provide me with photographic documentation that this has been done.

Attached to your September 20, 2010, email are photographs of a drum in the pressroom and one in the truck shop that are both labeled with the words "Used Oil". However, the three storage tanks must still be labeled with the words "Used Oil".

On September 24, 2010, I observed two pails of used oil inside the tank shelter that were not closed or labeled "Used Oil". On September 29, 2010, I received an email message from you explaining that the two pails had been poured into a 55-gallon drum that was labeled "Used Oil". MAS must submit a photograph of this drum which documents the condition of the drums and the label on it.

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

Containers and aboveground tanks for used oil at generator facilities must be in good condition (no severe rusting, apparent structural defects or deterioration) and not leaking. On July 22, 2010, I observed used oil staining inside the tank farm containment structure and used oil inside two sumps in the tank farm containment structure. Also, 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. (See Violation #4 below also.)

In order to correct this violation, MAS was required to follow the requirements listed below, for Violation #4.

In your September 20, 2010, email message to Ohio EPA, you explain that on July 10, 2010, the tank farm containment dike contained several inches of oily water as a result of rain. You also stated that "the sump pump in the containment dike has been repaired and [a] float [was] added to automatically pump into the tanks. An alarm (a blinking light) has been added to alert personnel if the pump fails to function properly." Furthermore, you stated that "The small leak from the crossover pipe that is contained in the dike area will be repaired pending the lowering of the tank, after testing, to a level that will allow for the repair". Please explain when this repair was completed.

**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.

In your September 20, 2010, email message to Ohio EPA you state that "the released material was water mixed with Shell AW Hydraulic #46. MSDS #65501E. Quantity and duration is uncertain. Likely quantity is measured in the hundreds of gallons of the oily mixture. The release is believed to have started when rising water levels from a heavy rain event reached one or more of the cracks in a concrete containment area and stopped when the water level was lowered as a result of the material moving through the cracks. The rain event was approximately 8:00 on Thursday July 8, 2010. The discharge had stopped by the time it was located at approximately 2:00 pm Saturday July 10, 2010."

You explained that after repairs to the tank farm sump pump system and installation of an alarm light, plant power service personnel were instructed to monitor the tank levels on a daily basis. You also stated that the truck containment area was cleaned and sealed with a clear epoxy sealer on August 17, 2010, and that the inside of the tank farm dike will be sealed after the internal piping leaks are repaired. Please explain when this repair was completed.

You stated in your September 20, 2010, email message to Ohio EPA that MAS believes that all the repairs described in your email "will prevent any further discharge." MAS may still need to demonstrate that it has a system in place to prevent used oil from being released to Heilman Ditch.

Ohio EPA will inform you of any other requirements, if necessary, in a future letter.

In addition, on July 22, 2010, I observed a large amount of used oil on the floor of the basement, especially in the area under Press Line 7. You explained to me that at certain times of the year, this basement can become flooded with water. Therefore, MAS was required to do the following:

3. Evaluate the condition of the basement to determine if used oil can escape (since ground water can enter).

In your September 20, 2010, email message to Ohio EPA you clarify that the basement floor does not flood. There has been minimal seepage and staining on the walls. On September 24, 2010, you described the water as a small amount of nuisance water. You also state in your September 20, 2010, email that "the ground water and rain water are independently managed through a system of downspouts and perimeter drains." On September 24, 2010, I observed the rain water sump in the basement. MAS may still need to demonstrate that it has a system in place to prevent used oil from being released from the basement. Ohio EPA will inform you of any other requirements, if necessary, in a future letter.

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

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

MAS did not place its lamps in a closed container. In order to correct this violation, MAS was required to place all spent lamps into containers or packages that are structurally sound and adequate to prevent breakage of the spent lamps; close each container; and submit photographic documentation that this has been done.

Attached to your September 20, 2010, email is a photograph of two containers of universal waste lamps that are closed. Therefore, this violation was abated on September 20, 2010.

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

A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

MAS was not able to demonstrate the length of time the universal waste batteries were accumulated. In order to correct this violation, MAS was required to place a date on each battery or container of batteries once a universal waste battery is placed on it and submit photographic documentation that this has been done.

Attached to your September 20, 2010, email is a photograph of your used battery accumulation unit. The unit is labeled with the words "Used Batteries" and each battery has a tag attached to it identifying it as a universal waste battery and indicating the accumulation start date. Therefore, this violation was abated on September 20, 2010.

In the August 19, 2010, NOV, Ohio EPA also requested other information and action regarding the operations of the facility, including the following:

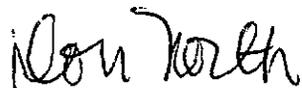
Provide a diagram of the facility. **Attached to an email message dated September 20, 2010, is a diagram of the facility including sewer lines. Therefore, this request has been fulfilled.**

Clean the floor and provide lighting so that I can observe the sump in the basement. Please inform me as soon as this is done so that I can make arrangements to return to the facility. **In preparation for my follow-up inspection on September 24, 2010, MAS cleaned the basement floor and provided the necessary lighting. This was confirmed during my follow-up inspection on September 24, 2010. Therefore, this request has been fulfilled.**

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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.