



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

Re: Ridge Engine & Machine  
OHD018172718  
Lucas County  
Hazardous Waste  
**Notice of Violation/  
Partial Return to Compliance**

January 10, 2013

Mr. Tom Ridge, Owner  
Ridge Engine & Machine  
1236 Conant Street  
Maumee, Ohio 43537

Dear Mr. Ridge:

Thank you for your December 10, 2012, response to Ohio EPA's October 12, 2012, Partial Return to Compliance (PRTC) letter. Ridge Engine & Machine (hereafter referenced as Ridge) submitted analytical results for the spent sandblasting material.

The analytical results, submitted on December 10, 2012, in response to the waste evaluation violation (#1), indicate that the spent sandblasting material is hazardous due to the presence of lead at 5.37 mg/L, which is above the regulatory limit of 5.0 mg/L. The spent sandblasting material is a characteristic waste hazardous for lead (D008).

Based upon the analytical results for the spent sandblasting material, Ohio EPA has determined that as of December 10, 2012, Ridge is in violation of the following additional Ohio hazardous waste law:

**4. Ohio Revised Code (ORC) Section 3734.02 (E) & (F): Permitted Facilities for the Treatment, Storage, and Disposal of Hazardous Waste:**

No person shall treat, store, or dispose of hazardous waste without a hazardous waste facility permit.

Ridge was allowing the hazardous sandblasting waste material (D008) to vent directly outside using the pipe that they installed through a hole in the building wall. This is considered disposal of a hazardous waste to the air and the ground. According to ORC Section 3734.02 (E) & (F) this practice is not legal as a permit is required to dispose of hazardous waste and the spent sandblasting material would be categorized as a characteristic hazardous waste (D008) per OAC Rule 3745-51-24.

Ridge uses the sandblasting unit on a daily basis to clean the engine parts they repair. The facility stated that they have always vented the spent sandblasting material directly outside.

It is unclear as to how much sandblasting waste material has been disposed of to the air and ground during their years of operation. The facility was operating as a non-generator of hazardous waste at the time of the compliance evaluation inspection on July 17, 2012. The facility is now a hazardous waste generator and must establish their generator status based upon how much sandblasting waste material (D008) is generated in a given month. There are three categories of hazardous waste generators. They are conditionally exempt small quantity generators (CESQG), small quantity generators (SQG) and large quantity generators (LQG). Enclosed is a hazardous waste generator requirement summary table for use once you have established your generator status.

Ridge collected a representative sample of the sandblasting waste material from the waste collection drawer located on the sandblasting unit. The drawer was full and the waste material (approximately one quart) was generated over the course of approximately one week of routine daily operation.

Ridge has become an unpermitted hazardous waste disposal facility. Ridge must immediately cease disposing of the spent sandblasting material by venting the sandblasting unit directly outside and allowing the material to be released into the air, and ultimately on the ground. Ridge must properly collect, store and dispose of the spent sandblasting material as a characteristic hazardous waste. Ridge must create and submit an internal policy to address this practice and submit documentation to verify that this policy has been reviewed with all shop personnel. Ridge must submit photographic documentation to demonstrate that the spent sandblasting material is being properly managed.

Since Ridge violated ORC 3734.02 (E) & (F), Ridge is subject to all applicable general facility standards found in Ohio Administrative Code (OAC) Chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Ridge begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

The following is a summary of the violations discovered during my July 17, 2012, inspection and cited in the July 31, 2012, Notice of Violation letter 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, Ridge did not have waste evaluation documentation for the spent sandblasting material. Ridge has historically disposed of this spent material as a non-hazardous waste by venting it directly outside the building. A vent pipe is attached directly on to the sandblasting machine and the pipe passes through a hole in the wall of the building. The sandblasting material generated while using the machine on a daily basis is allowed to pass through the vent pipe and is disposed into the air.

On August 1, 2012, I spoke with you regarding the spent sandblasting material. You stated that a collection bag has been attached to the vent pipe and that an enclosure was being built to house the collection bag. On August 14, 2012, Ridge submitted, via electronic mail, a picture of the collection bag and containment box build to properly collect the spent sandblasting material. Ridge will have this waste stream evaluated once enough has accumulated to collect a representative sample for analysis.

On December 10, 2012, Ridge submitted a copy of the analytical results for the spent sandblasting material. The analytical results indicate that the spent sandblasting material is hazardous due to the presence of lead at 5.37 ppm, which is above the regulatory limit of 5.0 ppm. Ridge installed a new sandblasting unit and the waste evaluation results are for the sample collected from the new unit. The old sandblasting unit would not operate properly when a collection bag was attached to the end of the vent pipe located outside. The facility decided to begin using a new sandblasting unit that was equipped with a collection tray for the spent sandblasting material.

*With this information, this portion (a) of the violation has been abated.*

- b) In addition, Ridge failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility.

*This portion (b) of the violation was previously abated on August 1, 2012.*

*This violation has been completely 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."

Ridge had six 5-gallon buckets of used oil that were not properly labeled.

*This violation was previously abated on August 2, 2012.*

3. **OAC Rule 3745-279-24: Off-Site Shipment:**

Generators shall ensure that their used oil is transported only by transporters who have obtained an EPA identification number.

Ridge has been giving the used oil they generate to various customers for their personal used oil burners.

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**On December 10, 2012, Ridge reported that they have contacted DISC Environmental (DISC) to manage the used oil generated at the facility. To date, Ridge has been collecting the used oil in a drum and will contact DISC to have it recycled as needed.**

***With this information, this violation has been abated.***

Ridge needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of receipt of this letter, Ridge is requested to provide documentation to this office including the steps taken to abate the additional violation cited above.

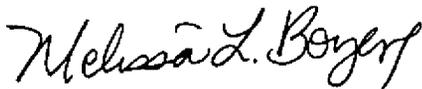
Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [melissa.boyers@epa.ohio.gov](mailto:melissa.boyers@epa.ohio.gov).

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, Ridge is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

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

Sincerely,



Melissa L. Boyers  
Division of Materials and Waste Management

/l/r

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)  
Melissa Boyers, DMWM, NWDO

**Notice:**

Ohio's 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.