



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

Re: Tiffin Parts LLC  
OHD003978293  
Seneca County  
NOV/RTC

February 15, 2013

Mr. Thomas J. Ardner, Parts Manager  
Tiffin Parts  
235 Miami Street  
Tiffin, Ohio 44883

Dear Mr. Ardner:

On January 31, 2013, the Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Tiffin Parts LLC (Tiffin Parts) located at 235 Miami Street, Tiffin, Ohio. This inspection was conducted to determine Tiffin Parts's compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Tiffin Parts was represented by you. Ohio EPA was represented by me. The inspection included a tour of the facility and review of facility paperwork. This letter will explain the violation I found.

Tiffin Parts is a parts distribution center for heavy equipment and industrial engine parts. Tiffin Parts buys parts from OEMS, distributors, and subcontractors then they ship to Tiffin Parts. Tiffin Parts then repackages the parts and sends to customers. Tiffin Parts has not conducted manufacturing at the facility since 1998 or 1999. Tiffin Parts is a non-generator of hazardous waste. Tiffin Parts had notified on July 6, 2009, as a small quantity generator of hazardous waste (D029, D039, D040) but we were unable to determine the root of this notification. Tiffin Parts generates lamps, and used oil from one on-site forklift.

During the CEI, Tom Hampshire, Warehouse Supervisor, stated that he thought lamps were taken to Mohawk Supply (Mohawk) in Tiffin for recycling. I called Mohawk on February 8, 2013, and they stated they do not recycle Tiffin Parts' lamps. In addition, you emailed me on February 11, 2013, stating that you could not find any receipts indicating that your lamps have been taken to Mohawk. You are unsure how the lamps are managed.

During the inspection, I gave you the following information: the Ohio EPA fact sheets Universal Waste Rules for Handlers of Lamps; Fluorescent Lamps: What you Should Know a sample universal waste management plan for lamps and a list of lamp recyclers in Ohio.

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I found the following violation of Ohio's hazardous waste laws:

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

Any person who generates a waste must determine if that waste is a hazardous waste in accordance with the criteria for hazardous waste as set forth in Chapter 3745-51 of the Administrative Code.

Tiffin Parts failed to have waste evaluation documentation or an established recycling plan in place for the fluorescent bulbs generated at the facility. It is unknown how the facility is currently managing its fluorescent bulbs.

- ***On February 12, 2013, you sent me an email indicating you will be taking your bulbs to Mohawk for recycling, thus this violation is abated. Please ensure to follow the universal waste requirements as outlined in the information I provided to you during the CEI.***

On February 13, 2013, I spoke with Miami Industrial Truck in Findlay pertaining to the servicing of your forklift. Miami stated that they have provided service to your forklift but that they have not provided oil changes, etc. for your forklift dating back to at least 2007. Please note that if/when you service your forklift, the fluids (transmission, used oil, etc.) generated from this service should be recycled. Please consult the enclosed fact sheet The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil for information pertaining to the management of used oil.

**Pollution Prevention:**

If you find additional ways to recycle, reduce, or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. Furthermore, you may possibly reduce your regulatory requirements. Or if you would like a free, non-regulatory on-site pollution prevention assessment or more information about pollution prevention, please contact me at (419) 373-3082. Ohio EPA has helpful information about this at the following web address:  
<http://epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>.

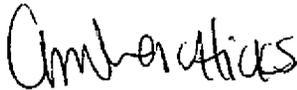
The Division of Materials and Waste Management (DMWM) has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>. Please feel free to share this information with your colleagues.

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Enclosed you will find a copy of the checklists that I completed during the inspection. No response to this letter is necessary. Should you have any questions, please feel free to call me at (419) 373-3082 or email me at [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/dmwmrules.aspx>.

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

/cg

Enclosures

pc: Lisa Gifford, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO (w/ checklist)

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, 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.

Send to Central Office <input checked="" type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [RCRAInfo.Data@epa.state.oh.us](mailto:RCRAInfo.Data@epa.state.oh.us).

<b>Site EPA ID No.</b>	EPA ID Number: <b>OHD003978293</b>	
<b>Site Name</b>	Name: <b>Tiffin Parts LLC</b>	Website: <b>www.tiffinparts.com</b> (Optional)
<b>Site Location Information</b>	Street Address: <b>235 Miami Street</b>	
	City, Town, or Village: <b>Tiffin</b>	State: <b>OH</b>
	County Name: <b>Seneca</b>	Zip Code: <b>44883</b>
<b>Site Land Type</b> (check only one)	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>		

<b>Facility Representative</b>	First Name: <b>Thomas</b>	MI: <b>J</b>	Last Name: <b>Ardner</b>
Additional names can be recorded in number 12	Title: <b>Parts Manager</b>		
Only provide address information if it is different than the site address	Phone Number: <b>1-800-219-6354</b>		Phone Number Extension:
	E-Mail Address: <b>tardner@tiffinparts.com</b>		
	Fax Number: <b>1-888-397-4794</b>		Fax Number Extension:
	Street or P.O. Box:		
	City, Town or Village:		
	State:	Zip Code:	

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: <b>Tiffin University</b>		Date Became Owner (mm/dd/yyyy): <b>12/31/12</b>	
	Owner Type:	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: <b>155 Miami St</b>			
	City, Town or Village: <b>Tiffin</b>		Owner Phone #: <b>(800) 968-6446</b>	
	State: <b>OH</b>		Country: <b>USA</b>	Zip Code: <b>44883</b>
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):	
	Operator Type:	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box:			
	City, Town or Village:		Operator Phone #:	
	State:	Country:	Zip Code:	

**VIOLATIONS CITED?**     Yes     No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)	
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))	
<input type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES	
<input type="checkbox"/> Batteries	
<input type="checkbox"/> Pesticides	
<input type="checkbox"/> Mercury containing equipment	
<input type="checkbox"/> Lamps	

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))	
<input checked="" type="checkbox"/> Used Oil Generator	
<input type="checkbox"/> Used Oil Transporter	
<input type="checkbox"/> Used Oil Transfer Facility	
<input type="checkbox"/> Used Oil Processor	
<input type="checkbox"/> Used Oil Re-refiner	
<input type="checkbox"/> Off-Specification Used Oil Burner	
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil	
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	

**Eligible Academic Entities with Laboratories:** Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University	
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university	
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university	

**Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

**COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.**

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		01/31/13 13:33

**Comments:**  
**Facility recently sold property to Tiffin University. Tiffin Parts now leases the property to operate their facility.**

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Tiffin Parts LLC   
**Facility Type:**  LQG   
 SQG   
 CESQG   
 TSD   
**Date of Inspection:** 1-31-13   
**EPA ID#:** OHD003978293

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Maintenance of forklift	Used Oil	?	NA	Unknown. Facility thought Miami Industrial Truck serviced but Miami states they have not since at least 2007. **	
2	Lighting	Lamps	~10-20/year		Now will take to Mohawk Supply in Tiffin for recycling.	Facility has begun to recycle.
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**REMARKS-GENERAL INFORMATION**

**General Process Information:**

\*\* I provided the facility with the Ohio EPA fact sheet on used oil and stated in my letter that if/when used oil is generated from the forklift this material should be recycled as outlined in the fact sheet.

**Regulatory/Enforcement History** (if applicable):

**Additional P2 remarks and information:**

Would this facility be interested in a P2 assessment?  Yes\*  No \*If yes, refer promptly to your district P2 coordinator.  
 Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or [p2mail@epa.state.oh.us](mailto:p2mail@epa.state.oh.us) or [www.epa.state.oh.us/ocapp/ocapp.html](http://www.epa.state.oh.us/ocapp/ocapp.html)

**Other:**