



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

Re: Ameriwood Industries  
~~OH0041922473~~ OH0004194247  
Complaint # 3224  
Seneca County  
NOV

February 15, 2013

Mr. Ed Ollom, EHS Manager  
Ameriwood Industries  
458 Second Avenue  
Tiffin, Ohio 44883

Dear Mr. Ollom:

On January 31, 2013, the Ohio EPA conducted a complaint investigation at Ameriwood Industries located at 458 Second Avenue, Tiffin, Ohio. The complaint was received by the Division of Materials and Waste Management (DMWM) on January 11, 2013. The complainant stated that used oil from the air compressors is released onto the indoor railroad track spur. The complainant stated this practice has been occurring "for a long time" and the ground is heavily saturated. This letter will explain the validity of the complaint.

Ameriwood Industries manufactures furniture (bookcases, shelves, etc). from medium density fiberboard and particleboard for such stores as Big Lots and Wal-Mart.

Ameriwood Industries has an air compressor room. Condensate blow down from the air compressors is filtered through an oil water separator. Oil from the separator is pumped into a bucket which is then picked up by Safety-Kleen Systems as used oil. The water is routed along hoses then discharged onto the ground in the board warehouse along the railroad. Two hoses from the air compressor room discharge onto the railroad track in the board warehouse. I observed where this water is discharged. The areas were wet from the discharge and at least one of the areas of discharge was discolored. There was no petroleum odor.

On February 8, 2013, you emailed me stating that you had placed containers beneath the discharge areas immediately after my visit and have been collecting this material. Approximately 30-gallons of discharge are generated per day and you indicated that Ameriwood Industries has been discharging the water from the oil separator to the railroad spur in excess of two years.

During the CEI, I gave you a list of Commercial Environmental Laboratories.

I found the following violation of Ohio's hazardous waste laws. Ameriwood Industries needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. **Within 14 days of receipt of this letter**, Ameriwood Industries is requested to provide documentation to this office including the steps taken to abate the violation cited below.

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 [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov).

**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.

Ameriwood Industries failed to have waste evaluation documentation for the water generated from the air compressors which is filtered through the oil/water separator. This water is discharged onto the ground in the board warehouse along the railroad spur.

To properly evaluate this waste stream, Ameriwood Industries must 1) submit adequate generator knowledge (Material Safety Data Sheets, etc.) or Ameriwood Industries must 2) take a sample of this waste stream through a laboratory analysis, Toxicity Characteristic Leaching Procedure (TCLP), which lists constituents present and at what concentration for the hazardous constituents that might reasonably be present in this waste stream as listed in OAC Rule 3745-51-24 following the methods as outlined in U.S. EPA's SW-846 or 3) a combination of 1) and 2).

- **To abate this violation**, please submit the analytical information from sampling or adequate generator knowledge to me. Your results must document if the waste is hazardous or not. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.

**2. Clean up and proper management of used oil releases.**  
**OAC Rule 3745-279-22 (D)**

Generators shall clean up and manage properly a release of used oil.

Ameriwood Industries had water/used oil staining on the ground along the railroad spur line. The water (which may still contain residual used oil), generated from the air compressors which is filtered through the oil/water separator, is discharged onto the ground in the board warehouse along the railroad spur.

- Ameriwood Industries needs to immediately clean-up all visible contamination of this material and put it in a closed, labeled (as to the contents) container in good condition. Then Ameriwood Industries needs to properly evaluate this waste to determine if it is hazardous or not.

Mr. Ed Ollom  
February 15, 2013  
Page 3

To properly evaluate the above waste stream, Ameriwood Industries must take a representative sample of this waste to properly evaluate this waste stream through a laboratory analysis which lists constituents present and at what concentration. Ameriwood Industries must sample the used oil stained soil to determine the TCLP concentrations of the RCRA **metals, semi-volatile organic compounds and volatile organic compounds** following the methods as outlined in U.S. EPA's SW-846.

- To abate this portion of violation, Ameriwood Industries must submit the analytical information to me. Your results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If it is hazardous, you must explain what treatment, storage, or disposal facility you will send it to. If the waste is hazardous, I will determine the status of your compliance with other hazardous waste laws and notify you of my findings in a separate letter.
- You shall submit to me the appropriate manifest documents, disposal receipt, or shipping papers indicating proper disposal of the contaminated soil, and pictures indicating the release has been cleaned up.

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

Ohio EPA did discover that discharge from the oil/water separator was being released along the inside railroad spur.

#### **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.

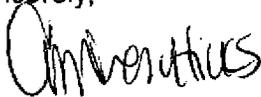
Mr. Ed Ollom  
February 15, 2013  
Page 4

Enclosed you will find a copy of the checklist that I completed during the inspection. Please address all correspondence via the postal service to Amber Hicks, Ohio EPA, 347 North Dunbridge Road, Bowling Green, Ohio 43402 or electronically to [amber.hicks@epa.ohio.gov](mailto:amber.hicks@epa.ohio.gov). 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).

Please be advised that a full compliance evaluation inspection was not conducted. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve you from having to comply with all applicable regulations.

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

Enclosure

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.

<b>Site EPA ID No.</b> <b>Site Name</b>  <b>Site Location Information</b>  <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHD004194247</b> Name: <b>Ameriwood Industries</b> Website: <b>www.ameriwood.com</b> (Optional) Street Address: <b>458 Second Avenue</b> City, Town, or Village: <b>Tiffin</b> State: <b>OH</b> County Name: <b>Seneca</b> Zip Code: <b>44883</b> <table style="width:100%; border: none;"> <tr> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input checked="" type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> </tr> </table>	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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<b>Facility Representative</b>  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name: <b>Ed</b> MI: Last Name: <b>Ollom</b> Title: <b>EHS Manager</b> Phone Number: <b>419-443-2467</b> Phone Number Extension: E-Mail Address: <b>ed.ollum@ameriwood.com</b> Fax Number: <b>419-447-7043</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: Date Became Owner (mm/dd/yyyy): <table style="width:100%; border: none;"> <tr> <td style="border: none;">Owner Type:</td> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input checked="" type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: Owner Phone #: State: Country: Zip Code: Name of Site's Operator: Date Became Operator (mm/dd/yyyy): <table style="width:100%; border: none;"> <tr> <td style="border: none;">Operator Type:</td> <td style="border: none;">Private</td> <td style="border: none;">County</td> <td style="border: none;">District</td> <td style="border: none;">Federal</td> <td style="border: none;">Indian</td> <td style="border: none;">Municipal</td> <td style="border: none;">State</td> <td style="border: none;">Other</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> </tr> </table> Street or P.O. Box: City, Town or Village: Operator Phone #: State: Country Zip Code:	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other	<input type="checkbox"/>															
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<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>TYPE OF HANDLER - MARK "X" AS APPROPRIATE</b>	
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <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"/> Large Quantity Generator (LQG)	<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<br>(accumulates 5,000 kg. or more) |   |

**CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES**

- Batteries  
 Pesticides  
 Mercury containing equipment  
 Lamps

**USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))**

- Used Oil Generator  
 Used Oil Transporter  
 Used Oil Transfer Facility  
 Used Oil Processor  
 Used Oil Re-refiner  
 Off-Specification Used Oil Burner  
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil  
 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.

- College or University  
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university  
 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  Yes  No Additional Facility Representatives:  
Tanks  Yes  No  
Containers  Yes  No

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Amber Hicks		01/31/13 11:07

**Comments:**

This was a complaint investigation pertaining to one specific area - air compressor/used oil discharge. A full CEI was not conducted thus I did not inquire about all other hazardous wastes, universal wastes, etc. This form may not represent the most up to date information pertaining to all the activities at the facility.