



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

Re: Erie Industrial Park f.k.a. Slips Lubricant Corp.
Ottawa County
Complaint #3228
NOV

March 27, 2013

Mr. Aaron Wright, Owner
Allen County Pallet
700 East Hanthorn Road
Lima, Ohio 45804

Dear Mr. Wright:

Thank Ron Munnings, ERM, LLC, for accompanying me during the Ohio Environmental Protection Agency's (Ohio EPA) March 15, 2013, complaint investigation of Uniroyal Building located within the Erie Industrial Park, Port Clinton, Ohio. Slips Lubricant Corporation operated at the building prior to your ownership. I followed-up on a complaint regarding mismanagement of waste at the site.

Slips Lubricant Corporation (Slips) operated a used oil/lubricant recycling business at the site until the building was purchased by you back in 2007. It appears that the containers previously inventoried back in January 2007, by Charles Hilse, Environmental Operations, remain in the building.

Based on my observations, I found the following violations of Ohio's hazardous waste laws. You need to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, you are requested to provide documentation to this office including the steps taken to abate this violation.

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

Any person, who generates a waste, as defined in Rule 3745-51-02 of the administrative code, must determine if that waste is a hazardous waste.

You have failed to properly evaluate the containers of waste currently stored at your facility located at the former Uniroyal Building located at the Erie Industrial Park, Port Clinton, Ohio. This includes all waste listed below:

Inspection Area:

- a. 122 Pallets grease
- b. 4*120 lbs. (10 gallons) = 1,098 * 10 gallons (120 lbs.) used oil

Painting Area

- c. 84 55- gallon drums used oil (Fiske Brothers Refining Company)
- d. 9*120 lbs. grease
- e. 12 totes (~250 gallon) used oil or reformulated oil
- f. 7 above ground tanks ~3,000 gallons each (4,000 gallons 50% hydrogen peroxide solution)

Solvent Reclamation Room

- g. 69 pallets * 4 drums grease & miscellaneous = 276 55-gallon drums
- h. 340 drums of grease & miscellaneous
- i. 1 tote grease
- j. 6 grease containers * 120 lbs.
- k. 40 pallets empty drums --- 160 55-gallon steel drums

Boiler Room

- l. 20 55-gallon drum -- boiler water treatment chemicals

Raw Material Storage Area

- m. 214 55-gallon drums --- grease/used oil
- n. 72 pallets (288 55-gallon drums) grease/used oil
- o. 8 totes -- used oil/grease
- p. 107 pallets -- 428 grease drums
- q. 14 cubic yard boxes -- solid compound unknown

In order for you to determine whether these wastes exhibit any hazardous waste characteristics, you must obtain a chemical analysis of a representative sample of the wastes. You will need to contract the services of an environmental laboratory to analyze these materials. You must determine the concentrations of toxicity characteristic leaching procedure (TCLP) volatile organic compounds (VOCs), TCLP semi-volatile organic compounds (SVOCs), and TCLP Resource Conservation and Recovery Act (RCRA) metals of the wastes. If the wastes can be considered a liquid, then you must also determine the pH and flashpoint of the wastes.

To abate this violation you shall submit the analytical results indicating the proper evaluation of the wastes for Ohio EPA's review. The results must document if the waste is hazardous or not and, if hazardous, whether it is restricted from land disposal. If the waste is hazardous, you must also submit information as to what treatment, storage, or disposal facility the waste will be sent to.

Once Ohio EPA acknowledges that you have properly characterized the wastes, you must dispose of the wastes at a proper disposal facility. You must then submit the appropriate manifest documents or shipping papers indicating proper disposal of the wastes to Ohio EPA.

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Please notify me at least five days prior to sampling so that I may be present.

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.

For more information I have enclosed the fact sheets titled Identifying Your Hazardous Waste, dated April 2010, Use of Generator Knowledge In Complying with OAC rule 3745-52-11 Hazardous Waste Evaluation, dated July 18, 2005, and Commercial Environmental Laboratories, printed March 18, 2013.

Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted electronically to ed.pulido@epa.state.oh.us. 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, you are requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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)373-3015.

Sincerely,



Edgar V. Pulido
Division of Materials and Waste Management

//lr

pc: Lisa Gifford, DMWM, NWDO
Colleen Weaver, Supervisor, DMWM, NWDO w/ original checklists

ec: Ed Pulido, DMWM, NWDO
Colleen Weaver, Supervisor, DMWM, NWDO w/ checklists

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"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to
Ruthanne.Flottman@epa.state.oh.us

Site EPA ID No.	EPA ID Number: OHD003941721									
Site Name	Name: Former Slips Lubricant Corporation	Website (Optional)								
Site Location Information	Street Address: Erie Industrial Park									
	City, Town, or Village: Port Clinton	State: OH								
	County Name: Ottawa									
Site Land Type (check only one)	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Private <input checked="" type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">County <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">District <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>	Private <input checked="" 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 <input type="checkbox"/>	Zip Code:
Private <input checked="" 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 <input type="checkbox"/>			
NAICS code(s) www.census.gov/epcd/www/naics.html										

Facility Representative	First Name: Ron	MI:	Munnings
Additional names can be recorded in number 12	Phone Number: (843)669-7447		Phone Number Extension:
	E-Mail Address: munnings@erm-llc.com		
	Fax Number:		Fax Number Extension:
Only provide address information if it is different than the site address	Street or P.O. Box:		
	City, Town or Village:		
	State:		Zip Code:

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Aaron Wright	Date Became Owner (mm/dd/yyyy): 04/01/2007										
	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="text-align: center; border: 1px solid black;">Owner Type: <input checked="" type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Private <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">County <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">District <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Federal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Indian <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Municipal <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">State <input type="checkbox"/></td> <td style="text-align: center; border: 1px solid black;">Other <input type="checkbox"/></td> </tr> </table>	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 <input type="checkbox"/>		
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	Street or P.O. Box: 700 East Hanthorn Road											
	City, Town or Village: Lima		Owner Phone #: (419)227-4240									
	State: Ohio		Country: USA Zip Code: 45804									
	Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):									
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	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 type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<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"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)
(CHECK ALL BOXES THAT APPLY)

Small Quantity Handler of Universal Waste Destination Facility for Universal Waste

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

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. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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:

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 checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Ed Pulido		03/15/2013 10:00 Hrs

Comments: Complaint #3228, Facility not in operation, container left behind from previous business.