



State of Ohio Environmental Protection Agency

Southeast District Office

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Certified: 7006 3450 0001 9056 3281

September 15, 2008

**ATHENS COUNTY
OHIO UNIVERSITY
DHWM/SEDO**

Mr. Lawrence Gingerich
Ohio University
Department of Environmental Health and Safety
Hudson Health Center
Athens, OH 45701

Dear Mr. Gingerich:

On August 12 and 15, 2008, I inspected the eleven hazardous waste generation areas at Ohio University's (OU) Athens, Ohio campus to determine OU's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC).

This letter will explain the violations found, what you need to do to correct the violations, other general concerns identified in the inspection, what you need to do to respond to the general concerns and the pollution prevention opportunities identified.

For the following Conditionally Exempt Small Quantity Generators inspected, no violations of Ohio's Hazardous waste laws were identified:

- Culter Hall Area 2 OHD982628430
- Innovation Center Area 4 OHD982628505
- Porter Area 5 OHD982628513
- Irvine Area 6 OHD982628521
- Receiving Area 9 OHD982628554

For the following areas, violations of Ohio's hazardous waste laws were found as detailed below: With the exception of Physical Plant Area 7, all of these areas were small quantity generators. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

- Hudson Health Center Area 1 OHD980586226
- Clippinger Area 3 OHD982628422
- Physical Plant Area 7 OHD982628539
- Airport Area 8 OHD982628547

- The Ridges Area 10 OHD986975068
- South Green Area 11 OHD98697173

(1) **OAC Rule 3745-52-34(D)(5)(b), Accumulation Time of Hazardous Waste:** Small Quantity Generators of Hazardous Waste must post the following information next to the telephone: The name and telephone number of the emergency coordinator; location of fire extinguishers and spill control material, and, if present, fire alarm(s); and the telephone number of the fire department, unless the facility has a direct alarm.

The following areas did not have the required emergency information posted in the areas where hazardous waste is managed: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10.

In order to return to compliance with this rule, OU must post the required information by the telephones in the labs and maintenance areas where hazardous waste is generated and accumulated and in the hazardous waste storage areas. In storage areas where telephones are not immediately available, the information must still be posted so that it is available for use with the cellular phone. Provide this office with a copy of the posting to demonstrate abatement of this violation.

(2) **OAC Rule 3745-65-32(C), Required Equipment:** All facilities shall be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below: Portable fire extinguishers, fire control equipment (including, but not limited to, special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment.

The following areas did not have the required emergency equipment available in the hazardous waste storage areas: Hudson Health Center Area 1, Clippinger Area 3, and Airport Area 8.

In order to return to compliance with this rule, OU must place the required emergency equipment in the hazardous waste storage areas of Hudson Health Center Area 1 and the Airport Area 8. To demonstrate abatement of this violation, provide this office with photographs that show the emergency equipment in place.

(3) **OAC Rule 3745-65-33, Testing and Maintenance of Equipment:** All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

In the following Small Quantity Generator areas, OU failed to conduct emergency equipment inspections and record the inspections in a log: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10. OU must immediately begin conducting these required inspections. To demonstrate abatement of this violation, provide this office with a copy of two weeks of completed inspection logs.

- (4) **OAC Rule 3745-66-74, Inspections:** The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary.

In the following Small Quantity Generator areas, OU failed to conduct weekly inspections of the container storage areas and record the inspections in a log: Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10.

OU must immediately begin conducting weekly inspections of all the hazardous waste container storage areas in Hudson Health Center Area 1, Clippinger Area 3, Airport Area 8, and The Ridges Area 10. To demonstrate abatement of this violation, provide this office with a copy of two weeks of completed inspection logs.

- (5) **OAC Rule 3745-52-34(C)(1)(a), Accumulation Time of Hazardous Waste:** Generators who engage in satellite accumulation of hazardous waste must comply with OAC Rule 3745-66-73(A) which states that containers holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

In Airport Area 8, a 55-gallon drum accumulating D008 oil in the maintenance hanger had an open locking drum funnel in the bung hole.

During the inspection, the lid on the drum funnel was closed, returning the facility to compliance with this rule. OU should make all employees in the airport maintenance facility aware of the requirement to keep hazardous waste accumulation containers in the hangers closed at all times when waste is not being added or removed from the containers.

- (6) **OAC Rule 3745-52-34(C)(1)(b), Accumulation Time of Hazardous Waste:** Generators who engage in satellite accumulation of hazardous waste must mark the accumulation containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

In Airport Area 8, a 55-gallon drum accumulating D008 oil in the maintenance hanger was not labeled to identify its contents.

In order to return to compliance with this rule, OU must label all hazardous waste satellite accumulation containers with the words "Hazardous Waste" or with other words that identify the contents of the containers. In order to demonstrate that OU has abated this violation, submit photographs showing that the containers have been properly labeled.

- (7) **OAC Rule 3745-52-34(D)(4), Accumulation Time of Hazardous Waste:** Small Quantity Generators of hazardous waste may, for one hundred eighty days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit, provided that: the generator complies with the requirements of paragraphs (A)(2) and (A)(3) of this rule. Paragraphs (A)(2) and (A)(3) require the following: The date upon which each period of accumulation and/or treatment

begins is clearly marked and visible for inspection on each container; and while being accumulated and/or treated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste".

In the Airport Area 8 hazardous waste storage outbuilding, OU failed to have a 5-gallon can of D008 oil labeled "Hazardous Waste" or marked with an accumulation date. At The Ridges Area 10 hazardous waste storage area in Building 32, OU failed to label and date cans of waste paint and a box of acid that were being stored.

In order to return to compliance with this rule, OU must label the containers in the Airport storage building and Building 32 with the words "Hazardous Waste" and with the accumulation start date. In order to demonstrate that OU has abated this violation, submit photographs showing that the containers have been properly labeled.

- (8) **OAC Rule 3745-66-71, Conditions of Containers:** If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from such container to a container that is in good condition or manage the waste in another manner that complies with the requirements of Chapters 3745-65 to 3745-69 and 3745-2483745-256 of the Administrative Code.

In the Airport Area 8 hazardous waste storage outbuilding, OU was storing D008 oil in a 5-gallon metal can that was in poor condition. The sides of the container were extremely rusted, such that a layer of the metal was flaking off. In violation of the above rule, OU failed to transfer the hazardous waste from the container that was not in good condition to a container that was in good condition.

In The Ridges Area 10 Building 32 storage area, OU was storing hazardous waste acid in its original packaging of an inner liner within a cardboard box. The cardboard box was in poor condition, from what appeared to be damage caused by contact with a liquid. Because of the damage, the cardboard container was no longer structurally sound. In violation of this rule, OU failed to transfer the waste from the container that was not in good condition to a container that was in good condition.

In order to return to compliance with this rule, OU must transfer the hazardous waste in the rusted metal can and the hazardous waste in the damaged cardboard box into containers that are in good condition. In order to demonstrate that OU has abated this violation, submit photographs documenting that the waste has been transferred to containers that are in good condition.

- (9) **OAC Rule 3745-52-11, Hazardous Waste Determination:** Any person who generates a waste, must evaluate the waste to determine if that waste is a hazardous waste in accordance with the criteria set forth in OAC Rule 3745-51.

In The Ridges Area 10, OU failed to evaluate five lab sink traps being stored in Building 32. Each of the trap containers appeared to have material inside them. During the inspection, you reported that traps were in the building in 2003 when you started working for OU EHS and that their contents were unknown.

OU must immediately evaluate these waste sink traps to determine if they are a listed or a characteristic hazardous waste. As detailed in OAC Rule 3745-52-11(C), waste determination may be made either by testing or by generator knowledge. In order to return to compliance with this rule, submit documentation of your waste determination to this office for review.

(10) ORC §3734.02(E) and (F), Prohibitions: (E) No person shall establish or operate a hazardous waste facility, or use a solid waste facility for the storage, treatment, or disposal of any hazardous waste, without a hazardous waste facility installation and operation permit issued in accordance with section 3734.05 of the Ohio Revised Code.

(F) No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any facility not authorized to manage the hazardous waste.

OU has established an unpermitted hazardous waste facility at The Ridges Area 10 Building 32 by illegally storing, disposing, and transporting hazardous waste as detailed below.

Storage and Transport

OU has used Building 32 to store D001 waste paint and D008 waste paint chips that were not generated in The Ridges Area 10. OU has had a practice of allowing their painting department to transport waste paint and waste paint chips to Building 32 for storage, even though the waste was generated from other generator ID areas of campus. OU also used Building 32 to store a D001 waste gasoline and diesel fuel mixture that was generated by OU's golf course, which is located in the South Green Area 11. This D001 waste was also illegally transported by OU from the golf course to Building 32.

Disposal

During the inspection, waste paint in thirteen 1-gallon, three 1-pint, and one 1-cup size paint cans in Building 32 was being disposed of on-site by evaporation to the air. The paint cans had varying amounts of waste in them from several inches to nearly empty. All the lids had been removed from the cans, which were stacked in a pyramid fashion to facilitate drying.

To abate these violations, OU must cease their practice of transporting and storing hazardous waste from other generator areas of campus in Building 32. In addition, OU must immediately close all containers of hazardous waste paint that are being evaporated. OU should demonstrate their compliance with this law by providing a plan that describes how OU will properly manage, transport, and dispose of their hazardous waste.

Ohio EPA considers these violations to be very serious in nature. Since OU The Ridges Area 10 violated ORC §3734.02(E) and (F), The Ridges Area 10 is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Be advised that due to the nature of the violation Ohio EPA may require closure pursuant to

OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. Additionally, at any time Ohio EPA may assert its right to have The Ridges Area 10 begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

- (11) **OAC Rule 3745-52-20(A), Manifest - General Requirements:** A generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22, and if necessary, U.S. EPA form 8700-22A (the continuation sheet) before transporting the hazardous wastes off-site. Completion of items one through twenty and items twenty-one through thirty-five, respectively, on these forms must be accomplished by the generator, transporter, or owner/operator.

The South Green Area 11 transported or offered for transportation 100 gallons of D001 waste gasoline and diesel fuel mixture, to The Ridges Area 10 Building 32 without a hazardous waste manifest.

This waste was later manifested from The Ridges Area 10 for off-site disposal at a permitted disposal facility. OU is not a registered hazardous waste transporter nor are any of OU's generator areas permitted treatment, storage or disposal facilities; therefore, in the future OU must not transport their hazardous between generator areas. At this time, no further action is necessary to abate this violation.

- (12) **OAC Rule 3745-66-73(A), Management of Containers:** A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection of The Ridges Area 10, there were in thirteen 1-gallon, three 1-pint, and one 1-cup size open cans of waste paint in the Building 32 storage area.

In order to return to compliance with this rule, OU must immediately close or place in a closed container all open paint cans containing hazardous waste. In order to demonstrate that OU has abated this violation, submit photographs showing how the containers are being stored.

- (13) **OAC Rule 3745-273-14(A), Labeling/Marking - Standards for Small Quantity Handlers of Universal Waste:** Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

OU was storing universal waste batteries in The Ridges Area 10 Building 32. None of the batteries or the containers holding the batteries was labeled as required by the rule.

In order to return to compliance with this rule, OU must label or mark clearly, either each individual battery or the containers holding the batteries with any one of the following

phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."
In order to demonstrate that OU has abated this violation, submit photographs showing the labeled batteries or containers.

- (14) **OAC Rule 3745-273-13(D)(1), Waste management - Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows: 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.

In The Ridges Area 10, OU was storing universal waste lamps in cardboard containers that were open and that were not structurally sound. The boxes of lamps were stacked and piled in the room in a careless fashion that would tend to lead to breakage as lamps could spill out of the containers or the containers could be knocked over and have their contents broken. There were shards from broken lamps on the floor of the storage room, indicating that the lamps were not being managed in a way that prevented releases to the environment.

In order to return to compliance with this rule, OU must immediately place all universal waste lamps in closed containers that are structurally sound. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste lamp storage area.

- (15) **OAC Rule 3745-273-13(D)(2), Waste management - Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps, and must lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

OU failed to cleanup and contain broken lamps in The Ridges Area 10 universal waste lamp storage area. This failure was evidenced by shards from broken lamps on the floor of the storage room.

In order to return to compliance with this rule, OU must immediately clean up and place in a container any pieces of broken lamps and any lamps that are broken. The containers used for the cleanup must be closed, structurally sound, compatible with the contents of the lamps. Waste from the cleanup must then be evaluated to determine if it is and hazardous waste and then managed accordingly. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste storage area floor and the containerized lamp waste.

- (16) **OAC Rule 3745-273-14(E), Labeling/Marking- Standards for Small Quantity Handlers of Universal Waste:** Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

OU was storing universal waste lamps in a storage room at The Ridges Area 10. None of the lamps or the containers holding the lamps were labeled as required by the rule.

In order to return to compliance with this rule, OU must label or mark clearly, either each individual lamp or the containers holding the lamps with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." In order to demonstrate that OU has abated this violation, submit photographs showing the labeled lamps or containers.

- (17) **OAC Rule 3745-273-16, Employee training for small Quantity Handlers of Universal Waste:** A Small Quantity Handler of universal waste shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the types of universal waste handled at the facility.

In The Ridges Area 10, OU failed to inform their employees, who handle universal waste lamps and batteries, of the proper handling and emergency procedures. This is evidenced by the following: neither the batteries or lamps were properly labeled; lamps were stored in open containers that were not structurally sound; and broken lamps in the storage area had not been cleaned up.

In order to return to compliance with this rule, OU must provide documentation to this office that they have informed all employees who handle universal waste of the proper handling and emergency procedures.

- (18) **OAC Rule 3745-273-17(A), Response to Releases- Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.

OU failed to contain the broken lamps in The Ridges Area 10 universal waste storage area. This failure was evidenced by shards from broken lamps on the floor of the storage room.

In order to return to compliance with this rule, OU must immediately contain the residues from the broken lamps in the universal waste storage area. Waste from the cleanup must then be evaluated to determine if it is and hazardous waste and then managed accordingly. In order to demonstrate that OU has abated this violation, submit photographs of the universal waste storage area floor and the containerized lamp waste.

- (19) **OAC Rule 3745-273-17(B), Response to Releases- Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must determine whether any material resulting from the release is hazardous waste, and if so, must manage the hazardous waste in compliance with all applicable requirements of Chapters 3745-50 to 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code. The handler is considered the generator of the material resulting from the release, and must manage it in compliance with Chapter 3745-52 of the Administrative Code.

OU had broken lamps in The Ridges Area 10 universal waste storage area and failed to determine whether any material resulting from the broken lamps is hazardous waste.

In order to return to compliance with this rule, OU must evaluate the broken lamp material to determine if it is a hazardous waste and manage it accordingly. In order to demonstrate that OU has abated this violation, submit documentation of the waste characterization to this office.

- (20) **OAC Rule 3745-279-22(C) Used Oil Storage Requirements for Generators:** Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Initially, the used oil tank and portable used oil containers at the Service Garage located in Physical Plant Area 7 were not labeled "used oil." The tank and containers were labeled during the inspection, returning the facility to compliance with this rule during the inspection.

Comments

- (a) OAC Rule 3745-273-15 limits the accumulation time for universal waste to no longer than one year from the date the universal waste is generated, or received from another handler. Those accumulating universal waste are required to be able to demonstrate the length of time that the universal waste has been accumulated. There can be an exception to the one year storage time limit if the longer storage time is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. As required by this rule, OU should be prepared to provide information in the future, if requested, that will document the length of time that universal waste has been stored on-site. OU should also be prepared, if applicable, to provide proof of the necessity to store their universal waste beyond the one year time limit.
- (b) On the first day of the inspection, August 12, 2008, it was observed that in Physical Plant Area 7, used oil had been spilled on the ground next to the Service Garage's used oil tank and oil dry had been placed on the spill to absorb the oil. On August 15, 2008, the second day of the inspection, it was observed that spilled oil had been completely

cleaned up. Please note that OAC Rule 3745-279-22(D) requires the following "Upon detection of a release of used oil to the environment that is not subject to the requirements of Chapter 1301:7-9 of the Administrative Code and which has occurred after October 20, 1998, a generator shall/must perform the following cleanup steps: (1) Stop the release; (2) Contain the released used oil; (3) Clean up and manage properly the released used oil and other materials; and (4) If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service."

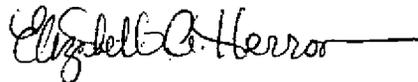
- (c) During the inspection, a Frog Ranch salsa jar was observed in the Clippinger hazardous waste storage area. This jar contained a cloudy green liquid and was labeled with a piece of masking tape as uranylacetate waste. You stated that uranylacetate is a radioactive waste. Please verify with OU's radioactive waste management plan whether or not this is an acceptable storage practice for radioactive waste.
- (d) During the inspection, a white powder was observed in the bottom of one of the four flammable material storage cabinets located in the Boyd Hall hazardous waste storage area for Irvine Area 6. (At the time of the inspection, Irvine Area 6 was a conditionally exempt small quantity generator of hazardous waste.) The white powder had a circular imprint in it that gave the appearance that a round container of some sort had been in that spot in the cabinet and leaked. OU should cleanup the spilled material, evaluate whether or not it is a hazardous waste, and properly manage the waste according to its waste evaluation. Please submit a response to this office as to what the material was determined to be and how it was managed.
- (e) During the inspection of the Corrosion Center in Receiving Area 9, a metal 5-gallon Isopropanol container with a corroded bottom was found sitting in an open 55-gallon drum of what appeared to be used oil dry. On close examination of the container, it was found to have "LVT 200 waste oil" faintly penned on it. During the inspection, Al Schubert, of the Corrosion Center, could not confirm what the material in the container was or how it was going to be managed. Please submit a response to this office that provides an explanation of what the materials in the 5-gallon and 55-gallon containers are, waste evaluations for both containers, and an explanation of how the materials will be managed.
- (f) During the inspection of the Corrosion Center in Receiving Area 9 it was stated that the Corrosion Center has in the past disposed of oil waste using Safety-Kleen. Please submit documentation of past disposals with Safety-Kleen to confirm whether the oil waste has been manifested as hazardous waste or as used oil.
- (g) During the inspection of the Corrosion Center in Receiving Area 9, an area of dead grass was observed directly outside on of the facilities exit doors. Mr. Schubert stated that the dead grass was probably from dumping salt water used in the Corrosion Center experiments. The dumping of waste of any kind outside onto the ground is an unacceptable practice and must be immediately stopped. OU should take steps to educate all those working in the center that waste is not be dumped outside.

- (h) During the inspection, we walked through OU's painting department located in the Physical Plant Area 7. At the time of our visit, no one in the painting department was available to discuss the operations in their shop. The paint shop had a Uni-Ram solvent distillation unit. Please submit the following information about the paint shop's solvent usage: type of solvent that is used, number of gallons of solvent that is distilled at a time, the frequency of solvent distillation, how the still bottoms from the unit are disposed of, and the amount of still bottoms that are generated by the unit.
- (i) During the inspection of the Airport Area 8 hazardous waste storage building, I observed a dried black stain on the floor which ran from the back corner of the building to the floor drain in the center of the building. At the time of our visit, neither you nor Todd McGuire, of the OU Airport, were able to identify what the staining was from. Please look into the matter further and report to this office any additional information you can obtain about what was spilled or leaked on the floor. OU must also provide information on where the floor drain leads. Ohio EPA strongly recommends that OU consider sealing the floor drain, to prevent any accidental releases of waste to the environment, which could lead to a costly cleanup.
- (j) To help hazardous waste generators comply with Ohio's hazardous waste regulations, Ohio EPA offers the *Hazardous Waste Generator Handbook* on our web site at the following link: http://www.epa.state.oh.us/dhwm/pdf/gen_handbook.pdf. The handbook summarizes the requirements by generator size. You may find this break down of requirements by generator size to be helpful. As OU experiences fluctuations in waste generation amounts generator requirements can change. For example, generator areas that were conditionally exempt during this inspection will need to follow small quantity generator requirements if their generation amount exceeds 220 pounds in a given month. In addition to using the handbook, please feel free to contact me with any questions you might have about applying the regulations to OU's operations.
- (k) During the inspection, we spoke with Ron Ritchie at OU's Service Garage. Mr. Ritchie expressed interest in alternatives to the current solvent based parts washer unit that is used by the Service Garage. Enclosed with this letter is *Ohio EPA's Parts Washer Handbook* which may be useful to Mr. Ritchie as he evaluates changing the garage's parts washing practices.
- (l) Ohio EPA would like to encourage OU to look for ways to reduce the amount of waste generated on campus. If OU finds ways to recycle, reduce or altogether eliminate certain waste streams OU may be able to reduce treatment and disposal costs, and may possibly reduce their regulatory requirements. Ohio EPA has a pollution prevention program that can provide free, non-regulatory assistance with reducing both solid and hazardous waste generation. If you would like to be considered for an in depth on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact Ohio EPA's Donna Goodman at 740 380-5293. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Mr. Lawrence Gingerich
Ohio University
September 15, 2008
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Enclosed you will find a copy of the checklists that completed for the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm

Enclosures

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.

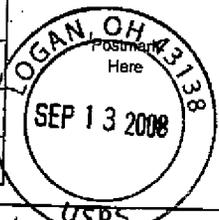
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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.70



Sent to Lawrence Gingerich, Ohio Univ.
 Street, Apt. No., or PO Box No. Hudson Health Ctr.
 City, State, ZIP+4 Athens, OH 45701

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, CV on the front if space permits. 	<p>A. Signature X <u>J. Roeder</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>J. ROEDER</u> C. Date of Delivery <u>9-15-08</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p><u>Mr. Lawrence Gingerich</u> <u>Ohio University</u> <u>Dept. of Envir. Health + Safety</u> <u>Hudson Health Ctr.</u> <u>Athens, OH 45701</u></p>	<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>7006 3450 0001 9056 3281</p>	

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No.	EPA ID Number: OHD982628539									
Site Name	Name: Ohio University Physical Plant Area 7					Website: (Optional)				
Site Location Information	Street Address: Physical Plant Area 7, Ohio University									
	City, Town, or Village: Athens					State: OH				
	County Name: Athens					Zip Code: 45701				
Site Land Type (check only one)	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 checked="" type="checkbox"/>	Other <input type="checkbox"/>		
NAICS code(s) www.census.gov/epcd/www/naics.html										
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Lawrence			MI:	Last Name: Gingerich					
	Phone Number: 740 593-1663				Phone Number Extension:					
	E-Mail Address:						Fax Number Extension:			
	Fax Number:			Fax Number Extension:						
	Street or P.O. Box: Ohio University Hudson Health Center									
	City, Town or Village: Athens					State: OH		Country: USA		Zip Code: 45701
	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: Ohio University				Date Became Owner (mm/dd/yyyy):				
Owner Type:		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 checked="" type="checkbox"/>	Other <input type="checkbox"/>	
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):						
Owner Type:		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"/>	
Street or P.O. Box:										
City, Town or Village:				Operator Phone #:						
State:				Country:		Zip Code:				
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
Type of Generator										
<input type="checkbox"/> Not Regulated					<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11					<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)					<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)										
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 generated and/or accumulated (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. 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:	Ron Ritchie
Tanks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Other Comments:	
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)	
Elizabeth Herron		08/12/08 10:30-4 PM 08/15/08 11:00-5 PM	
OPTIONAL CERTIFICATION: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.			
Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)	

PROCESS DESCRIPTION

The Ohio University (OU) campus has been divided up into 11 Areas that have US EPA ID numbers for the generation of hazardous waste. When hazardous waste is generated in a department, that department fills out an internal form called the Chemical Waste Disposal Form. The form is designed to collect information on the amount and type of waste and its characteristics. Under OU's waste management system the department generating the waste is also expected to label the waste with a hazardous waste label provided by OU's Department of Environmental Health and Safety (EHS). The form is then forwarded to EHS to trigger a pickup of the waste by EHS. EHS then transfers the waste to the designated waste storage area for the part of campus where the waste was generated. Hazardous waste is transported off-site site for disposal twice a year (June and December) by Chemical Analytics of Romulus, Michigan. Information provided on the Chemical Waste Disposal Form is used by Chemical Analytics to classify the waste and determine which hazardous waste codes apply to the waste. Alternately, if warranted by the quantity of waste generated, EHS will have Chemical Analytics pick the waste up directly from the generator, rather than first moving it to a designated waste storage area.

OU manages their waste lamps and batteries as a universal waste. The lamps which are generated campus wide are stored in a storage room at the Ridges. Waste batteries, also from all areas of campus, are stored in at the Ridges in Building 32. OU acts as a small quantity handler and self transporter of universal waste. OU self transports their universal waste from around campus to the storage areas in the Ridges.

WASTE ACTIVITIES

Area 7 includes the University Service Garage building and the Facilities Management Buildings. Lawrence Gingerich reported that he was not aware of Area 7 generating any waste other than used oil. It was reported that the paint shop is located in Area 7 but that because they paint all over campus, their practice has been to leave their waste at Building 32 in the Ridges Area 10. During the facility walk through a Uni-Ram Solvent still was observed in the paint shop area. At the time of the inspection no paint shop employees were available therefore no further information on the shop's waste management practices was available.

The Service Garage is responsible for maintaining a fleet of 392 vehicles. Vehicle maintenance generates used oil and lead acid batteries. The used oil is stored in an estimated 500-600 gallon tank outside, along front wall of the building by the service bay doors. The used oil tank is pumped out and taken off site by Thompson's Waste Oil. Oil generation rates range from 60 to 200 gallons a month. The Service Garage arranges for the used oil pickups without involvement from the Environmental Health and Safety office.

Spent batteries are returned to Interstate Batteries for recycling. The Service Garage also has one parts washer on-site. No waste disposal records for the parts washer were available at the time of the inspection. The Service Garage has been under new management by Ron Ritchie since October 2007. Mr. Ritchie reported that no solvent from the parts washer had been disposed of during his time at OU.

Regulatory/Enforcement History (if applicable):

This facility was last inspected in 1996 and 1991 and 1988. OU's waste management practices were the subject of Director's Final Findings and Orders dated January 4, 1990 which resulted in a closure action at OU's airport facility.

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 or www.epa.state.oh.us/ocapp/ocapp.html

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

Initially the used oil tank and portable used oil containers at the Service Garage were not labeled "used oil." The tank and containers were labeled during the inspection, returning the facility to compliance with this rule during the inspection.

9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

On the first day of the inspection, August 12, 2008, it was observed that used oil had been spilled on the ground next to the used oil tank and oil dry had been placed on the spill to absorb the oil. On August 15, 2008, the second day of the inspection, it was observed that spilled oil had been completely cleaned up.

ON-SITE BURNING IN SPACE HEATERS		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		