



State of Ohio Environmental Protection Agency

Southeast District Office

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Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
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January 3, 2007

**ATHENS COUNTY
VERIZON NORTH, INC.
DHWM/SEDO
OHD 123 222 317**

Mr. Paul Gebhard
Verizon North, Inc.
1500 MacCorkle Avenue SE
Charleston, WV 25314

Dear Mr. Gebhard:

On December 19, 2006, I inspected Verizon North Inc.'s (Verizon) facility in Athens, Ohio to determine Verizon's compliance with Ohio's hazardous waste and used oil 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 violation identified during the inspection.

At the time of the inspection, Verizon was found in violation of the following:

(1) **OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators:**

Containers and above ground tanks used to store used oil must be labeled with the words "Used Oil." At the time of the inspection, Verizon's used oil tank was not labeled with the words "Used Oil," in violation of this rule. Facility personnel correctly labeled the tank during the inspection, returning Verizon to compliance with this rule.

Verizon was previously inspected on May 15, 2001, and was also found in violation of this same labeling requirement for the same used oil tank. Verizon should take actions to ensure that they maintain compliance with this rule in the future. Repeated violations can, in some circumstances, prompt Ohio EPA to take enforcement action.

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/>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

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.

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

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

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHD 123 222 317								
3. Site Name	Name: Verizon North, Inc.						Website (optional:)		
4. Site Location Information	Street Address: 754 W. Union Street								
	City, Town, or Village: Athens				State: OH				
	County Name: Athens				Zip Code: 45701				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.			B.					
	C.			D.					
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Paul			MI:	Last Name: Gebhard				
	Phone Number: 304 344-6503				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box: 1500 MacCorkle Avenue SE								
	City, Town or Village: Charleston								
	State: WVA		Country: USA			Zip Code: 25314			
8. 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.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):					
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
	City, Town, or Village:				Owner Phone #:				
	State:				Country:		Zip Code:		
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	Street or P.O. Box:								
City, Town, or Village:				Operator Phone #:					
State:				Country:		Zip Code:			
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No					
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/>	Not Regulated								

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities

(choose only one of the following categories)

<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input checked="" type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility

B. Universal Waste Activities		C. Used Oil Activities	
<input type="checkbox"/>	1. Small Quantity Handler of Universal Waste (Indicate types of universal waste generated and/or accumulated (check all boxes that apply):	<input checked="" type="checkbox"/>	1. Used Oil Generator
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste (accumulates 5,000 kg or more).	<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	3. Destination Facility for Universal Waste (Check all boxes below that apply for each of the three types of facilities above.)	<input type="checkbox"/>	Transporter
		<input type="checkbox"/>	Transfer Facility
		<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	Processor
		<input type="checkbox"/>	Re-refiner
		<input type="checkbox"/>	4. Off-Specification Used Oil Burner
		<input type="checkbox"/>	5. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off-Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

	<u>Generated</u>	<u>Accumulated</u>
A. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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 RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D039					
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

No	Announced ?	Additional Facility Representatives:
Yes	Tanks?	Other comments: Spoke with Paul Gebhard by phone before conducting the inspection.
Yes	Containers?	

13. Name of inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/ Time (mm-dd-yyyy) (HH:MM) _____

Elizabeth Herron _____ December 19, 2006

14. 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/ WASTE SUMMARY SHEET

Facility Name: Verizon North Facility Type: CESQG Date of Inspection: December 19, 2006 EPA ID#: OHD123222317

Waste Generated			On- or Off-Site Management		
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	
1	vehicle maintenance	used oil	27 gallons, tank, outside maintenance garage	N/A	Safety-Kleen Ashland, KY
2	vehicle maintenance	used oil filters	300 pounds per year in 2006, 55-gallon drums, inside maintenance garage	N/A	Safety-Kleen Ashland, KY
3	vehicle maintenance	spent brake cleaning solution, D039	5 gallons every 3 months, generated at point of removal from brake cleaning unit in the maintenance garage	N/A	Safety-Kleen Ashland, KY
4	vehicle maintenance	spent parts washer solvent, D001, D039	13-17 gallons every 3 months, generated at the point of removal from the parts washer unit in the maintenance garage	N/A	Safety-Kleen Ashland, KY
5	vehicle maintenance	spent batteries	average 4 batteries each month, stored n a shelf inside the maintenance garage	N/A	returned to Interstate Batteries for recycling

REMARKS-GENERAL INFORMATION

General Process Information:

This Verizon facility houses employees who perform engineering for new phone line installations and reworking of existing phone lines. There is also a phone line repair and service group based at this facility. There is an on-site maintenance garage for the fleet of Verizon service vehicles used at this location. The vehicle maintenance is the source of all hazardous waste generated by the facility.

Regulatory/Enforcement History (if applicable): Previous hazardous waste inspections were conducted at this facility on May 15, 2001 and May 19, 1997. In 2001 the facility was cited for a used oil labeling violation. In 1997 no violations were cited.

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION

1. Have all wastes generated at the facility been evaluated? Yes No N/A ___RMK#___
[3745-52-1.1]

GENERATOR CLASSIFICATION

2. Does the generator produce ≤ 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No ___ N/A ___RMK#___

NOTE: *If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.*

NOTE: *To convert from gallons to pounds:*

Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes No N/A ___RMK#___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
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 ___ No N/A RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes ___ No N/A ___ RMK# 1

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes ___ No N/A RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___
- c. Cleaned up and properly managed the used oil and other materials? Yes ___ No N/A RMK# ___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK# ___
10. Does the generator burn used oil in used oil fired space heaters? [3745-279-23] If so: Yes ___ No N/A ___ RMK# ___
- 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 ___ No N/A RMK# ___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A RMK# ___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK# ___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes ___ No N/A RMK# ___

REMARKS

1. At the time of the inspection the used oil storage tank was not labeled with the words "Used Oil." During the inspection the tank was labeled, returning Verizon to compliance with this rule.