



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

Re: Pandora Grain and Supply  
OHD017548652  
Allen County  
NOV/RTC

May 6, 2013

Mr. Gary Luginbill, President  
Pandora Grain and Supply  
P. O. Box 446  
Pandora, Ohio 45877

Dear Mr. Luginbill:

On April 23, 2013, the Ohio EPA conducted a hazardous waste compliance evaluation inspection (CEI) of Pandora Grain and Supply (Pandora) located at 241 Cherry Street, Bluffton, Ohio. This inspection was conducted to determine Pandora's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC), and Ohio's hazardous waste regulations as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Pandora was represented by Matt Roethlisberger. Ohio EPA was represented by Wendy Miller and me. The inspection included a tour of the facility. This letter will explain the violation I found.

Pandora is a grain elevator. Grains are dried, stored and shipped from this facility. Pandora has been at this site for 8-10 years. The facility does not have a maintenance area or conduct servicing of vehicles. Pandora is a non-generator of hazardous waste. Pandora generates lamps. Farmers Grain Co. had notified on August 3, 1987, as a small quantity generator of hazardous waste (D001, P123) at this address. Farmers Grain Co. is no longer at this address and has not been at this address for at least 20 years. P123 (toxaphene) is an insecticide which was banned for use in the U.S. Thus, it appears this notification was required when Farmers Grain Co. had to dispose of this material.

During the inspection, I gave Mr. Roethlisberger the following information: the Ohio EPA fact sheets Universal Waste Rules for Handlers of Lamps; Fluorescent Lamps: What you Should Know a sample universal waste management plan for lamps and a list of lamp recyclers in Ohio. I have enclosed with this letter as well. Please share this compliance information with your other grain shops.

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

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

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

Pandora failed to have waste evaluation documentation or an established recycling plan in place for the lamps (fluorescent bulbs, incandescent, etc.) generated at the facility. The facility was throwing these lamps in the trash.

- ***On April 23, 2013, during the CEI, Mr. Roethlisberger told me that Pandora would begin managing their lamps as universal waste including recycling lamps with Environmental Recycling, thus this violation is abated.*** Please ensure to follow the universal waste requirements as outlined in the information enclosed.

**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.

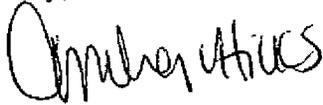
You can find copies of the rules and other information on the division's web page at <http://epa.ohio.gov/dmwm/dmwmrules.aspx>.

Enclosed you will find a copy of the checklists that I completed during the inspection. No response to this letter is necessary.

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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).

Sincerely,



Amber M. Hicks  
Division of Materials and Waste Management

Enclosures

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

ec: Amber Hicks, DMWM, NWDO  
Colleen Weaver, DMWM, NWDO  
EPA RCRAInfo Data ([RCRAInfoData@epa.state.oh.us](mailto:RCRAInfoData@epa.state.oh.us)) (w/ checklist)

**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>	EPA ID Number: <b>OHD017548652</b>							
<b>Site Name</b>	Name: <b>Pandora Grain and Supply</b>				Website: (Optional)			
<b>Site Location Information</b>	Street Address: <b>241 Cherry Street</b>							
	City, Town, or Village: <b>Bluffton</b>				State: <b>OH</b>			
	County Name: <b>Allen</b>							
<b>Site Land Type</b> (check only one)	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"/>
<b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	<b>493130</b>							

<b>Facility Representative</b>	First Name: <b>Matt</b>		MI:	Last Name: <b>Roethlisberger</b>		
Additional names can be recorded in number 12	Title: <b>No title</b>					
	Phone Number: <b>419-358-5931</b>			Phone Number Extension:		
Only provide address information if it is different than the site address.	E-Mail Address:					
	Fax Number:			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):				
	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:				Owner Phone #:				
	State:				Country:		Zip Code:		
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Operator 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:		

<b>VIOLATIONS CITED?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

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

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

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

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

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

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.
<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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

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

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	<b>Gary Luginbill, President 419-384-3255</b>
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
<b>Amber Hicks</b>	<b>Wendy Miller</b>	<b>04-23-13 13:25</b>

**Comments:**  
Please note name change from Farmers Grain Co to Pandora Grain and Supply (new ownership).

## PROCESS, WASTE, P2 SUMMARY SHEET

**Facility Name:** Pandora Grain and Supply **Facility Type:**  LQG  SQG  CESQG  TSD **Date of Inspection:** 4-23-13 **EPA ID#:** OHD017548652

Waste Generated			On- or Off-Site Management		P2 Activities	
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 applicable	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.	Current P2 Activities	P2 Opportunities
1	Lighting	Lamps.	~a couple/year		Thrown in trash. Facility cited for 52-11 (now corrected).	Facility is now recycling.
2						
3						
4						
5						
6						
7						
8						

**REMARKS-GENERAL INFORMATION**

**General Process Information:**

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

**Additional P2 remarks and information:**

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

**Other:**