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TO: Jason L. Sturgeon, District 5 District Deputy Director
Attn: Bob Roahrig, Facility Manager

DATE: June 12, 2018

FROM: Jennifer Townley, Deputy Director, Division of Planning

SUBJECT: District 5 Environmental Compliance Review
Product and Waste Management, including Fuel Tanks

Reference: ECR dates: May 9 and 10, 2018
ECR Team: Kevin Hodnett

Review No: Product and Waste Management including Fuel Tanks D5-01-18

Summary

On May 9-10, 2018, a staff member of the Office of Environmental Services (OES) conducted an Environmental Compliance Review (ECR) of waste handling and tank and product management procedures at the listed District 5 facilities. As a result of this review, OES has assembled recommendations for maintaining uniformity, a high standard of quality and regulatory compliance for the handling, storage and disposal of both products and hazardous materials as summarized in the Product and Waste Management Manual. The results of the ECR revealed approximately 11 non-compliance issues. The following comments are presented for use by District 5 to improve compliance with applicable regulations and limit long term risks from improper materials management.

Facilities Reviewed during the ECR:

- District Headquarters & Garage
- Fairfield County Garage
- Perry County Garage
- Muskingum County Garage
- Duncan Falls Outpost Garage
- Baltimore Outpost Garage

Tank Equipment Inspected

- Underground Storage Tanks (USTs)
- Aboveground Storage Tanks (ASTs)
- Dispenser and Piping
- Safety Equipment
- Labels and Placard
- Inventory Records
- Monitoring Systems

Representatives Attending Entrance & Exit Conference

The District was represented by Bob Roahrig, District Facilities Manager; Rebecca Starlin, District Safety Representative; Paul Wieber, District Hazardous Waste Coordinator; Brian Tatman, District Environmental

Coordinator; and Steve Smith, MS4 Liaison. The ODOT Office of Environmental Services was represented by Kevin Hodnett for the entrance and exit conferences. During the exit conference, the District was represented by Bob Roahrig, Facilities Manager; Paul Wieber, Hazardous Waste Coordinator; Brian Tatman, District Environmental Coordinator; and Rebecca Starlin, District Safety.

Authority for the Requirements during the QAR:

- Hazardous Waste Management Manual, April 2004 and Updates.
- Ohio Administrative Code 3745-51 to 279
- Ohio Administrative Code 3745-45-70
- Ohio Administrative Code 1301:7-7
- Ohio Administrative Code 1301:7-9
- 40 CFR Part 112
- 40 CFR 63, Subpart HHHHHH

Positive Items Noted During the ECR:

OES observed several positive practices relating to the product and waste handling procedures. They are as follows:

- The housekeeping practice in the all of District facilities was very good.

Areas for Improvement

- Numerous Items were found at all facilities in the District that were of concern:
  - Unlabeled and Miss-labeled containers
  - Compressed gas Cylinders

Conditions Found & Actions Recommended:

District Headquarters

1. **Storage Room Labeling:** At the District Headquarters there is a room where herbicides and pesticides are kept that has no labeling except for "Horticultural Storage" on the outer door. There should be labeling on the outside of each door indicating that herbicide and pesticide is stored in this room. Reference pictures are numbers 1 and 2.

2. **Mislabeled and Unlabeled Containers:** A garden sprayer with unknown contents and a windshield washer fluid container with oil in it were observed during the inspection of the cold storage buildings. All containers should be properly labeled for the contents stored. Reference pictures are numbers 3 and 4.

3. **Paint Booth Documentation** - During the inspection of the paint booth questions were raised about the paint booth filter certification, air flow gauge readings, paint gun certifications, and painter's certifications. None of the paperwork was readily available and certain items were not being tracked. (No reference picture available)

   - *OES will conduct a follow up visit with the painters and supervisor to ensure that all required*

documentation is kept available for inspection and that everyone associated with the painting operation is advised on the proper operation of the booth.

Muskingum County Garage

4. **Mislabeled and Unlabeled Containers:** Two small containers of unknown liquid were observed on a work cart in the parts room of the garage. All containers should be properly labeled for the contents stored. Reference picture is number 5.

5. **Improperly Stored Used Battery:** A single used automotive battery was observed sitting directly on the floor of the garage during the inspection. This battery should be placed on spill pallet or tub to prevent the potential for leakage onto the floor. Reference picture is number 6.

Perry County Garage (Temporary)

6. **Used Oil Collection Container:** An unlabeled used oil collection container was observed during the inspection of the temporary county garage. All containers should be properly labeled for the contents stored. Reference picture is number 7.

7. **Compressed Gas Cylinders:** Several unsecured compressed gas cylinders in a couple of different locations were observed during the inspection. All compressed gas cylinders should be properly secured to a fixed object to prevent the cylinders from falling over and potentially damaging the cylinder or other objects. Reference picture number 8, 9, and 10.

8. **Used Oil Container:** The 55-gallon drum used to store used oil was observed with a funnel place in the fill port of the drum. Having an open container of used oil with a funnel in it is a violation of the RCRA hazardous waste rules. All containers of hazardous waste must be closed at all times accept when being added to or taken away from. Used oil is considered a hazardous waste even though it is considered a "universal waste". Reference picture is number 11.

Baltimore Outpost

9. **Poly Tanks:** The poly tanks that hold liquid brine and calcium were observed unlabeled during the inspection. All containers should be properly labeled for the contents stored. Reference picture is number 12.

Fairfield County Garage

10. **Mislabeled and Unlabeled Containers:** Several garden sprayers with unknown contents were observed during the inspection of the cold storage building. All containers should be properly labeled for the contents stored. Reference pictures are numbers 13 and 14.

Duncan Falls Outpost

11. **Poly Tanks:** The poly tanks that hold liquid brine and calcium were observed unlabeled during the inspection. All containers should be properly labeled for the contents stored. Reference picture is number 15, 16, and 17.

12. **Industrial Waste Water:** Upon arrival to the outpost it was observed that the outpost employees had moved the equipment, washed down, and hosed out the garage into the parking lot area. This activity is a violation of the state's storm water regulations. All generation of industrial waste water is required to discharge into a municipal sanitary sewer system and not into the storm sewers or directly into a water body (Muskingum River). Reference pictures are numbers 18 and 19.

District Action Plan:

District 5 should provide a written Action Plan to OES within fifteen days from the date this report is received by the District. This Action Plan should address concerns related to each of the items listed above in the section titled "Conditions Found & Actions Recommended". A copy of District 5 Draft Action Plan can be found on O-drive.

Conclusion:

OES was pleased with the level of commitment that the District demonstrated during the ECR process. Most items found were minor and easily correctable.

Thank you for your help and cooperation in our efforts to keep our RCRA generator sites in compliance. If you have any questions or concerns, please contact Kevin Hodnett at (614) 466-7925.

TMH:MKP:kwh

cc: Tom Bradford, Highway Management Administrator, District 5
Al Rakas, Business and Human Resources, District 5
Bob Roahrig, District 5 Facilities Manager
Rebecca Starlin, Safety District 5
Paul Wieber, DHWC, District 5
Douglas Riffle, Fairfield County Manager
Tod Gottke, Perry County Manager
Phil Valentine, Muskingum County Manager
Jeff Hill, Licking County Manager
Nate Mack, District 5 Headquarters Garage Manager
Jennifer Townley, Deputy Director, Division of Planning, Central Office
Tim Hill, Office of Environmental Services Administrator, Central Office
Matt Perlik, Office of Environmental Services Assistant Administrator, Central Office
Carrie Yost, Administrator, Division of Equipment and Facilities Management, Central Office
Thomas Lyden, Administrator, Office of Maintenance Administration, Central Office

PICTURE DOCUMENTATION

1. D-5 Headquarters Garage – The horticultural storage area with minimal labeling as "Horticultrual Storage" and none indicating the storage of herbicides and pesticides.

2. D-5 Headquarters Garage – The labeling shown on the outer door to the herbide and pesticide storage area.

3. D-5 Headquarters Garage – Unlabeled garden sprayers obsered during the inspection of the cold storage building.

4. D-5 Headquarters Garage – Mislabeled windshield washer fluid container with motor oil in it.

5. Muskingum County Garage – Two small containers of unknown liquid were observed on a work cart located in the parts room of the garage.

6. Muskingum County Garage – Single used batter observed sitting directly on the floor of the garage.

7. Perry County Garage – The used oil collection container was observed during the inspection without the proper labeling for "used oil".

8. Perry County Garage – Unsecured compressed gas cylinders observed during the inspection of the temporary garage facility.

9. Perry County Garage – Unsecured compressed gas cylinders observed during the inspection of the temporary garage facility.

10. Perry County Garage – Unsecured compressed gas cylinders observed during the inspection of the temporary garage facility.

11. Perry County Garage – The used oil drum was observed with a funnel in the fill opening. Container should have been closed.

12. Baltimore Outpost – All of the poly drums holding brine and calcium were observed without proper labeling.

13. Fairfield County Garage – Several unlabeled garden sprayers with unknown contents were oberved during the inspection.

14. airfield County Garage – Several unlabeled garden sprayers with unknown contents were oberved during the inspection.

15. Duncan Falls Outpost - All of the poly drums holding brine and calcium were observed without proper labeling.

16. Duncan Falls Outpost - All of the poly drums holding brine and calcium were observed without proper labeling.

17. Duncan Falls Outpost - All of the poly drums holding brine and calcium were observed without proper labeling.

18. Duncan Falls Outpost – Upon arrival the garage was being washed out into the parking lot. Generation of industrial waste water into the parking lot.

19. Duncan Falls Outpost – Upon arrival the garage was being washed out into the parking lot. Generation of industrial waste water into the parking lot.