

*Helping communities and businesses access compliance, technical  
and financial assistance for their environmental needs*

June 8, 2016

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## Akron Waterways Renewed — With DEFA's Help

Like many cities, parts of Akron have combined sewers — pipes that carry sanitary sewage in dry weather and sanitary flows combined with storm water during wet weather.

When flows rise during and after rain, combined sewer overflow (CSO) structures release untreated sanitary sewage

mixed with storm water to the Little Cuyahoga River, Ohio Canal and Cuyahoga River. Under the banner, "**Akron Waterways Renewed!**" the City of Akron is addressing its CSO elimination needs.

Supported by loans from Ohio EPA's Division of Environmental and Financial Assistance (DEFA), the city is tackling the challenging, decades-long route that was mapped in its CSO Long-Term Control Plan (LTCP) and a 2009 federal Consent Decree.

Since 2004, Akron has received DEFA-administered Water Pollution Control Loan Fund (WPCLF) assistance of \$464,000,000 for planning, design and construction of 14 sewer separation and storage basin projects, and rehabilitation of the main trunk sewer. They received the largest single loan award in WPCLF history (\$254,000,000) for the Ohio Canal Interceptor Tunnel that alone will eliminate nine CSOs. Additional loans totaling \$52,000,000 are scheduled for later in 2016.

The need to meet the water quality goals of the LTCP and Consent Decree in a cost-effective way led to the negotiation an integrated plan. The Akron Integrated Plan, scheduling into 2040, uses combined sewer separation and green infrastructure alternatives (rain gardens, curbside infiltration basins and storm water treatment wetlands) to meet these goals.



**1.5 million gallon combined sewage  
storage basin under construction.**

“(Akron developed) a plan that met our regulatory requirements while developing alternative projects that provided equal or better environmental protection at a more affordable cost.” - John Moore, Akron Director of Public Service

Finally, through the WPCLF Water Resource Restoration Sponsor Program, Akron was also able to help support the financing of five wetland and stream restoration projects totaling \$5,500,000 in Akron, Columbus, Lucas County and Portage County.

If you would like more information about our various DEFA funding assistance opportunities, please call us at (800) 329-7518.

## Make a Difference with U.S. EPA’s Safer Choice Program

**U.S. EPA’s Safer Choice Program** encourages consumers, workplaces and communities to look for cleaning products that will protect public health and the environment.

Known formerly as the Design for the Environment program, Safer Choice goals include:

- Increasing awareness and recognition of the Safer Choice label on qualifying products; and
- Encouraging innovation and the development of safer chemicals and chemical-based products.

U.S. EPA developed the labels to make it easy for consumers and businesses to choose products that meet safer product standards, and perform well. More than 2,000 products currently carry the Safer Choice label. These products are available at retail stores and can be used at home and in businesses, schools, hotels, offices and sports venues.

Along with protecting human health, Safer Choice products are less toxic to fish and other aquatic life and they break down more quickly through natural processes, so they are less likely to become part of the food chain or damage the ecosystem. **Several manufacturers and companies in Ohio** have products that meet the standards of the Safer Choice Program and carry the Safer Choice label.



## Case Study — Encouraging Environmental Excellence (E3) Gold Award Winner — Enginetics

**Enginetics** is a manufacturer in Huber Heights, Ohio that serves the aerospace industry. Their metal forming operations include: manual and computerized numerical control (CNC) machining; lasers; presses; and other related equipment. In 2013, Enginetics received an E3 Bronze award from Ohio EPA and joined the Agency’s E3 Gold Level program in 2016.

Environmental stewardship activities at Enginetics include:

- Achieving ISO 14001 environmental management system standard certification.
- Reviewing all chemicals used prior to purchasing to identify the potential impact to the environment.
- Purchasing green products, (toilet paper, paper towels), using green cleaners and services that comply with ISO 14001.
- Replacing some aerosol products with liquids that can be applied with alternative methods, and evaluating the puncturing/recycling process for aerosol cans.
- Adopting a lean manufacturing program, **Theory of Constraints (TOC)** in 2012, which studies the production flow and helps reduce bottle-necks to improve efficiency. Using TOC, they reduced the manufacturing time of four specific operations from an average of 55 to 35 days.
- Conducting weekly and monthly audits of each department, by the Environmental, Health and Safety team. Through the audits, continuous improvements in each area are promoted and evaluated. Audit results are posted for the entire shop.

“Ohio’s people and businesses have long been leaders in the aerospace industry and Enginetics continues that tradition. However, they also are leaders in manufacturing with an eye on efficiency and environmental protection, particularly in the use of industrial chemicals. We are proud to present Enginetics our highest recognition for environmental stewardship.” – Ohio EPA Director, Craig W. Butler

- Employees submit suggestions that are evaluated by engineering, operations, quality and/or safety. More than a hundred suggestions are submitted annually. Employees that submit successful suggestions are rewarded during monthly company meetings. Rewards can go up to \$500 with the amount being based on the cost reduction and/or time savings achieved by the suggestion.
- Reducing the amount of product in storage from \$300,000 to less than \$175,000.
- Recycling more than 148,000 lbs. of processed material, saving more than \$169,000 in disposal costs since 2011.
- Reducing the amount of waste sent to landfills from 29.81 tons to 15.26 tons since 2011.
- Recycling 23.51 tons of wood since 2012, recycling plastics, paper and cardboard, and monitoring the use of electricity annually.

The E3 program provides three recognition levels: Achievement, Silver and Gold. The Gold Level recognizes organizations that are in environmental compliance, have completed environmental stewardship activities, and are committed to pursuing long-term environmental improvement projects. Any organization in Ohio may apply for membership. Applications are accepted annually and include both written and on-site evaluations.

Interested in applying for recognition for your organization under the E3 Program? If so, please visit [epa.ohio.gov/ocapp/ohioe3.aspx](http://epa.ohio.gov/ocapp/ohioe3.aspx) or call (800) 329-7518. We would be glad to help guide you through the process and get your organization the recognition it deserves.

## Case Study — Encouraging Environmental Excellence (E3) Gold Award Winner — University Hospitals Case Medical Center

Hospitals can be the largest employers in a community and can positively impact the environment when they pursue stewardship activities. In 2015, **University Hospitals Case Medical Center (UHCMC)** became the first hospital in Ohio to join as a Gold Level member of the E3 program. UHCMC participates in the challenges of the **Practice Greenhealth Healthier Hospitals Initiative**: Less Waste, Safer Chemicals, Leaner Energy, Smarter Purchasing, Healthier Foods and the Engaged Leadership Challenges.

Some of the stewardship activities at UHCMC include:

- Retrofitting lighting in operating rooms to LEDs, conserving energy and reducing maintenance costs.
- Reformulating contents of the surgical kits, reducing waste and landfill costs.
- Purchasing green bathroom, window and carpet cleaners.
- Increasing recycling rates for medical plastics to more than 50 tons, doubling the amount of plastics diverted from the landfill in the last year reported.
- Improving food composting efforts, diverting more than 67 tons of organic food from landfills.
- Recognizing employees for their efforts to promote health and wellness and save money. Engagement challenges are promoted to encourage employee wellness and sustainability. Participants are offered discounts on their health insurance premiums while also communicating sustainability goals.

“UHCMC actively seeks opportunities to promote social, economic and environmental well-being by building well, operating well, buying well and living well.” — University Hospitals’ CEO, Thomas F. Zenty III



University Hospital Case Medical Center’s Himanshu Pandya, Ohio EPA Director Craig Butler, Melissa Braskie, and Dr. Michael Anderson.

If you represent a hospital and are interesting in pursuing environmental stewardship activities, these resources are available to help you:

- The Environmental Leadership Council of the [Ohio Hospital Association](#).
- [Practice Greenhealth](#) is a not for profit organization that promotes best environmental management practices for the medical community and offers many tools to help hospitals measure and improve their environmental programs including the [Healthier Hospital Initiative Challenge program](#).
- Ohio EPA's [Office of Compliance Assistance and Pollution Prevention \(OCAPP\)](#) can [visit a facility](#) for a non-regulatory pollution prevention assessment to provide an extra set of eyes to help identify opportunities to reduce waste.
- Visit the [University Hospital Progress Report on Sustainability](#) for ideas.

The Ohio Hospital Association also recognizes outstanding environmental performance by hospitals through award programs.

## Ohio EPA's Package Plant Initiative

Last fall, Ohio EPA's Division of Environmental and Financial Assistance (DEFA), the Ohio Water Development Authority (OWDA) and Division of Surface Water (DSW) launched a Package Plant Initiative to assist small activated sludge process wastewater treatment plants (WWTP) with regulatory compliance.

Participants in the program receive activated sludge process control training, basic process control testing supplies and equipment, operator contact hours and optional membership in an operator's forum. There is no fee for program materials.

More than 30 plant operators located in Northwest Ohio attended the initial training. It was well-received by attendees. This spring, the next session will focus on Southwest Ohio. More training will soon be offered in Northeast, Southeast and Central Ohio.

As part of the initiative, Ohio EPA is also offering a tool lending library that includes centrifuges and dissolved oxygen meters. The library lends operators equipment from the Ohio EPA district offices on a check-out basis. These tools are valuable to assist operators in implementing their process control methods. The tool library will become available at each Ohio EPA district office after the training has been held in that region.

For more information about this Initiative, please [email Jon Bernstein](#) or call (614) 644-3715.

"I would like to thank you for the training course you offered in Fremont, Ohio regarding package plant systems. The technical workshop was very well presented and the field visits were just as helpful. It was possibly the best hands-on training I've attended in 25 years. Thank you for your continued support and that of the course sponsors." - Village Administrator

"Thank you and your team for hosting this workshop and also for the operational tools. This collaboration between treatment operators and the EPA is a must to secure the future of our valuable resources." - Village Wastewater Director

## Ohio EPA Training Opportunities

- June 22, 2016 — DEFA Webinar, [Ohio's Abandoned Gas Station Cleanup Grant](#)
- July 20, 2016 — DEFA Webinar, [Ohio's Water Pollution Control Loan Fund \(WPCLF\) 2017 Nominations Update](#)
- Aug. 30-31, 2016 — Ohio EPA's [Compliance Assistance Conference](#), Columbus, OH. Registration is open.

Have you missed a DEFA Webinar? Go to our [YouTube channel](#) to view the recording or our [Training Catalog](#) for archived training. Take a look at our [Training Calendar](#) to see more upcoming opportunities.

## Business Identification of Hazardous Waste is Essential

If you don't know whether your business generates a hazardous waste, or if you are not managing hazardous wastes properly, you could be in violation of federal/state laws and rules. **All** wastes generated from a business must be evaluated to determine if the waste is a hazardous waste. If you have a hazardous waste, Ohio has specific rules on how to handle and dispose of it. Ohio EPA's fact sheet [Identifying Your Hazardous Waste](#) can help you with this process.

Any material a business no longer uses is considered a waste. Hazardous waste may be either a listed waste (specific lists published in both U.S. EPA and Ohio EPA rules) or it may exhibit one or more hazardous characteristic(s).

Listed wastes are identified in both federal and state rules. Listed wastes include:

- **F-listed wastes** are from general processes such as cleaning, degreasing, metal finishing and manufacturing;
- **K-listed wastes** are from specific industrial processes such as chemical and pesticide manufacturing, petroleum refining and metal manufacturing; and
- **U- and P-listed wastes** are from unused, off-specification or discarded commercial chemicals.

**Characteristic hazardous waste, or D wastes**, include wastes that exhibit characteristic that make them hazardous. These characteristics include:

- **Ignitability** — where the waste has a flashpoint less than 140°F;
- **Corrosivity** — where the waste has the ability to corrode metals and has a pH less than or equal to 2, or greater than or equal to 12.5;
- **Reactivity** — where the waste is unstable, reacts violently, explodes or produces toxic vapors under certain conditions; or
- **Toxicity** — where the waste has specific toxic contaminants present in concentrations to be harmful to humans and/or the environment.

To identify your hazardous waste:

- 1) Examine all of your processes;
- 2) Make a list of **all** your wastes, even those you think are not hazardous; then
- 3) Carefully evaluate each waste stream.

When evaluating waste, you can send your waste to a laboratory for testing, use generator knowledge and use vendor-supplied information like Material Safety Data Sheets (MSDS). Ohio EPA's [Use of Generator Knowledge in Hazardous Waste Evaluation](#) fact sheet may help you. Note, that with few exceptions, any waste that is mixed with or derived from a listed hazardous waste (F, K, P or U lists) is also considered a listed hazardous waste. Examples include mixing an F-listed solvent with nonhazardous materials, and deriving distillation bottoms from reclaiming an F-listed solvent.

Read more about properly identifying and managing your hazardous waste in [Ohio EPA's Hazardous Waste Generator Handbook](#). Small businesses can also contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469 or (800) 329-7518 for free help. OCAPP is a non-regulatory office within the Ohio EPA that helps small businesses understand and comply with environmental requirements.



Some common hazardous wastes are:

- Spent cleaning or degreasing solvents [for example, xylene, acetone, MEK (methyl ethyl ketone), toluene, benzene, methanol], still bottoms;
- Old paint, paint booth filters;
- Mineral spirits or stoddard solvent, solvent wipers;
- Fluorescent bulbs containing mercury;
- Dry cleaning waste and filters;
- Printing wastes, lab chemicals, metal plating wastes and amalgam.

## Upcoming Deadlines

- July 1, 2016 — **Toxic Release Inventory (TRI) Reports**
- The **Water Pollution Control Loan Fund (WPCLF)** nomination window is Aug. 1-31, 2016

## Subscribe to Our Electronic Lists

Do you want to receive monthly electronic updates from DEFA or updates from other Ohio EPA divisions? Go to our Agency subscription page at <http://ohioepa.custhelp.com/cil/documents/detail/2/subscriptionpage>.

## Selecting a Treatment, Storage and/or Disposal Facility

Did you know that hazardous waste generators are responsible for the hazardous waste they generate from cradle-to-grave? In other words, once you generate the waste, you have the responsibility of ensuring that it is properly managed even **after** it leaves your facility. There are actions your business can take to reduce the chances your waste is mismanaged.

First, pick a Treatment, Storage and/or Disposal Facility (TSDF) that is in compliance with Ohio EPA regulations. Qualifications should include:

- 1) **The facility has an Ohio EPA hazardous waste permit.** Any facility that accepts hazardous waste for treatment, storage or disposal must have an Ohio EPA permit. The permit authorizes the types of waste a TSDF can accept and the treatment, storage and disposal activities that can be conducted. The permit outlines the operating conditions and recordkeeping procedures the TSDF must follow to ensure that wastes will be handled by Ohio EPA's rules.
- 2) **The facility is authorized to accept the type of hazardous waste you generate.** Find out if the TSDF is allowed to take your type of waste. You can contact the Division of Material and Hazardous Waste Management (DMWM) **hazardous waste inspector for the appropriate county** for this information.
- 3) **The facility is in compliance with environmental regulations.** Ohio EPA inspects TSDFs. You can check to see if Ohio EPA inspectors have issued Notice of Violation letters to a TSDF by using Ohio EPA's **eDocs** records search. You can also access compliance-related information for facilities through several national tracking systems maintained by U.S. EPA such as **Envirofacts** or **Enforcement and Compliance History Online (ECHO)**.

If you find non-compliance issues, contact an Ohio EPA inspector in the **district office** and ask:

- Have past violations been corrected by the TSDF?
- Are there current enforcement actions against the facility?
- Have they been penalized for violations? and
- Does the facility have financial assurance in accordance with the regulations to ensure that it can properly close or clean up its hazardous waste units?

A history of violations may signal poor waste management practices (for example, many spills, emergency incidents, unauthorized treatment/storage/disposal activities). For facilities that are not located in Ohio, the environmental agency in the state where the facility is located should have compliance and permitting information available. There is no contact list for all other state environmental agencies, however, contact information is available on **U.S. EPA's Regional Office website**.

It is also important you understand how your hazardous waste is going to be handled once it gets to the TDSF. For instance, your waste may be received by one facility for treatment and then shipped off to another site for disposal. In this situation, you should look at the compliance and operating status of both sites.

You may find Ohio EPA's fact sheet **Selecting a Treatment Storage and Disposal Facility to Manage Your Hazardous Waste** helpful with this process. Ohio EPA maintains a **list** of Ohio facilities permitted to treat, store and/or dispose of hazardous wastes.

Additional help is available through Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP). They can help you determine if the facility has other Ohio EPA permits, regulatory obligations, its compliance status, answer questions you may have or help you understand Ohio EPA's rules. OCAPP is a non-regulatory office within the Ohio EPA that helps businesses comply with environmental regulations and permitting requirements. For more information, contact OCAPP at (800) 329-7518, or visit our [website](#).

## Not All Air Emission Sources Require Air Permits

Does your business use materials or conduct activities that can release air pollutants? These are called air emission sources and many businesses have them. Common examples include surface coating and painting, material handling activities and operating fuel-burning equipment such as boilers and heaters.

For more help identifying air emission sources, see Ohio EPA's [Does My Small Business Need an Air Permit](#) fact sheet. Once your business has identified your air emission sources, the next question is "Do I need an air permit for each air emission source at my facility?" **Not necessarily.** If an air emission source meets certain criteria it may be exempt from air permitting.

Currently, there are three different scenarios in which an air emission source could be exempt from air permitting:

- 1) **The source is exempt under Ohio EPA's air regulations.**

Ohio EPA has determined that certain types of equipment and industrial activities which typically have lower air pollutant emissions do not require air permits. These activities and equipment are identified in the [air pollution rules as being exempt](#) from air permitting and include equipment such as small boilers and detergent-based parts washers and activities such as abrasive blasting and grinding. In some cases the source must meet certain criteria (such as specific horsepower, storage capacity, etc.) to qualify for the permanent exemption. You are not required to notify Ohio EPA if you have a source that is permanently exempt, however notification often helps future/new air inspectors understand your exemption status. If the exempt source is portable, the portable source notification requirements still apply.

- 2) **The source qualifies for a Permit-by-Rule (PBR).**

Specific low-emitting sources qualify for an air permit exemption known as Permit-by-Rule or PBR. The PBR exempts the air emission source from the formal paperwork permitting process, however still requires that the source meet certain emission and operating conditions. Currently, there are 11 specific types of equipment and/or industrial operations that can qualify for a PBR, including auto body refinishing shops, small crushing and screening plants and small natural gas-fired boilers and heaters.

To determine if your source qualifies for a PBR, begin by reviewing the [list of sources covered under Permit-by-Rule](#). If your source appears to qualify, review the [qualifying criteria, terms and conditions](#) associated with the PBR. For each air emission source that qualifies, you must complete the PBR notification form and submit it to Ohio EPA or your local air agency. While the PBR exempts a source from the administrative air permitting process, monitoring, recordkeeping and reporting requirements still apply. You may find Ohio EPA's [PBR fact sheet](#) helpful.

- 3) **The source has low emissions and is de minimis.**

In most cases, if an air emission source emits less than 10 pounds per day of particulate matter, sulfur dioxide, nitrogen oxides, organic compounds, carbon monoxide, lead or any other air contaminant and less than one ton per year of hazardous air pollutants (HAPs); then it is considered [de minimis](#) and does not require an air permit. However, there are some exceptions to this exemption.

### Tips to Evaluate if Your Air Emission Source Requires an Air Permit

- Start by identifying all sources of air pollution at your facility.
- Determine whether any of these sources are permanently exempt.
- Determine whether any sources qualify for a PBR.
- Calculate emissions to determine if any source is de minimis.

**Note:** an air permit is required for any air emission source that is not exempt. **Need help? Contact OCAPP for technical assistance.**

If you think that you have a low-emitting source that may be exempt from air permitting, you can calculate your air emissions and determine if they are less than 10 pounds per day. Then, review the [list of conditions](#) in the de minimis rule and ensure that your facility is allowed to use the de minimis exemption even if your emissions are less than 10 pounds per day. If you have a qualifying source and would like to claim the de minimis exemption, you are not required to notify the Ohio EPA or your local air agency; however the Ohio EPA district office or local air agency can review your de minimis calculations to ensure that your source qualifies. It is important to note that you must keep records demonstrating that your actual emissions do not exceed the de minimis thresholds.

For more information on air permit exemptions see Ohio EPA's [Air Permit Exemptions](#) fact sheet or contact your Ohio EPA [district office or local air agency](#). Small businesses can also contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 644-3469 or (800) 329-7518 for free help. OCAPP is a non-regulatory office within Ohio EPA that helps small businesses understand and comply with environmental requirements.

## LEARN THE LINGO

A number of laws serve as [U.S. EPA's](#) foundation for protecting the environment and public health. Here are some of the major laws.

The [Clean Air Act \(CAA\)](#) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes U.S. EPA to establish National Ambient Air Quality Standards (NAAQS) to protect public health and public welfare and to regulate emissions of hazardous air pollutants.

The [Clean Water Act \(CWA\)](#) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Under the CWA, U.S. EPA has implemented pollution control programs such as setting wastewater standards for industry. Water quality standards for all contaminants in surface waters were also set.

The [Comprehensive Environmental Response, Compensation, and Liability Act](#) otherwise known as CERCLA or Superfund -- provides a Federal Superfund to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills and other emergency releases of pollutants and contaminants into the environment. Through CERCLA, U.S. EPA was given power to seek out those parties responsible for any release and assure their cooperation in the cleanup.

The [Resource Conservation and Recovery Act \(RCRA\)](#) gives U.S. EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled U.S. EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

The [Safe Drinking Water Act \(SDWA\)](#) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources. The Act authorizes U.S. EPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary (health-related) standards.

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### ***Division of Environmental and Financial Assistance (DEFA)***

Helping communities and businesses access technical and financial assistance for their environmental needs.

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