



State of Ohio Environmental Protection Agency

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July 8, 2010

Mr. Gilbert Mayo, V.P. Operations
STAHL – a Scott Fetzer company
3201 W. Old Lincoln Way
Wooster, OH 44691

Re: **STAHL – a Scott Fetzer company**
OHD004287355
Morrow County
3rd Notice of Violation
CRO Information

Dear Mr. Mayo:

On November 5, 2009, Ohio EPA conducted a compliance evaluation inspection (CEI) at the STAHL – a Scott Fetzer company (Stahl) facility located at 201 Cunnard Street in Cardington, Ohio, Morrow County. The purpose of the CEI was to determine the facility's compliance with Ohio's hazardous waste management rules and regulations as found in Chapter 3745. of the Ohio Administrative Code (OAC) and Chapter 3734. of the Ohio Revised Code. During the CEI, Stahl was represented by Mr. Terry Hunter and I represented Ohio EPA. The CEI consisted of a review of facility operations and associated documentation. Based on the findings of this CEI, on November 24, 2009, Ohio EPA issued Stahl a notice of violation (NOV) letter.

Based upon receipt of documentation and a follow-up inspection on January 13, 2010, a partial return to compliance (PRTC) was issued to Stahl on January 29, 2010. After issuance of the partial return to compliance, I spoke with you and/or Stahl's consultant (Stout Water Solutions) several times regarding the remaining violation and what was needed to abate it. During these conversations, we also discussed the cessation of regulated operations (CRO) requirements stipulated in OAC Rules 3745-352 and the associated manual and documentation were provided to Stahl.

To date, Stahl continues to remain in violation of OAC Rule 3745-52-11, Hazardous Waste Determination, for failing to appropriately evaluate the waste waters generated from the *Fremont Cleaning Systems*. If Stahl is discontinuing operations at the Cardington facility, whether temporarily or permanent, the applicable CRO documentation must also be appropriately completed and filed.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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Stahl must immediately evaluate the waste waters generated from the *Fremont Cleaning Systems*, as specified in the January 29, 2010 PRTC, and submit the evaluation results and associated laboratory documentation to Ohio EPA for review. Also, Stahl must immediately file any applicable CRO forms, as it was reported by Ohio EPA's Division of Surface water that the Cardington facility's last day of current operations was June 30, 2010, based on their recent facility inspection. I have enclosed a copy of the *Cessation of Regulated Operations (CRO) Manual (2007)*, which includes filing forms, for your review and completion as needed.

Should you have any questions, I can be reached by telephone at 614-728-5037.

NOTICE: Ohio EPA's failure to list specific violations or deficiencies in this letter does not relieve Stahl from having to comply with all applicable regulations.

Respectfully,



Randy Sheldon
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

Enclosures

c: DHWM, CDO File

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