



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 E. Fifth St.  
Dayton, Ohio 45402

TELE: (937) 285-6357 FAX: (937) 285-6249  
www.epa.state.oh.us

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

May 8, 2008

Mr. Dustin Moore  
VP of Operations  
Cincinnati Tan Co. Inc.  
10152 International Blvd  
Cincinnati, Ohio 45246

RE: Return to Compliance

Dear Mr. Moore:

Ohio EPA sampled three different lamps used by Cincinnati Tan. The analysis showed the three bulbs to be non-hazardous. Based on this information, Ohio EPA has determined that Cincinnati Tan is no longer in violation of the following hazardous waste regulation:

- 1. Hazardous waste determination, Ohio Administrative Code (OAC) 3745-52-11.**

The results of bulb characterization can change between bulb models and bulb manufacturers. Please be aware that Cincinnati Tan is responsible for characterizing all bulbs prior to disposal. If you have any questions, please call me at (937) 285-6093.

Sincerely,

Cathy L. Altman  
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM-SWDO/SWDO File

**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.





**2134**

**Cessation of Regulated Operations**

**NOV**

**BUTLER**

**CONTINUOUS LINK COLOR**



State of Ohio Environmental Protection Agency

401 East Fifth Street  
Dayton, Ohio 45402-2911

Southwest District  
TELE: (937)285-6357 FAX: (937)285-6249  
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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

October 1, 2007

Mr. Dan Combs  
Continuous Link Color Inc.  
4820 Industry Drive  
Fairfield, OH 45014

**Re: Notice of Violation, Continuous Link Color Inc.; Butler County; CRO**

Dear Mr. Combs:

On September 27, 2007 you informed me in a telephone conversation that Continuous Link Color has yet to remove all regulated substances from its facility at 4820 Industry Drive, Fairfield, Ohio. Based upon this information, we have found Continuous Link Color is in violation of the following Cessation of Regulated Operations (CRO) law.

- (1) ***OAC 3745-352-20(A)(2), What are my responsibilities if I am an owner or operator?*** Within 90 days of ceasing regulated operations, you must submit a copy of the most recent chemical inventory form submitted to the State Emergency Response Commission in accordance with ORC §3750.08, including a statement indicating whether any asbestos-containing materials are present at the facility. You must also submit a copy of the most current hazardous chemical list (or MSDSs) that you are required to have on file with the State Emergency Response Commission under ORC §3750.07. You must also submit a list and location of every stationary item on site that contains or is contaminated with a regulated substance, including an identification of the regulated substance in each. You must also legally remove from the facility all regulated substances and all debris, nonstationary equipment and furnishings, nonstationary containers, and motor vehicles and rolling stock that contain or are contaminated with regulated substances.

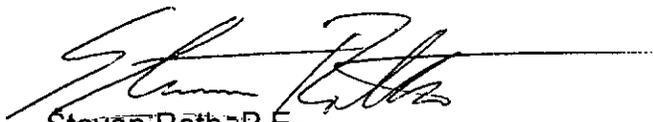
On June 11, 2007 Continuous Link Color notified Ohio EPA that they ceased operations on June 7, 2007. The CRO regulations require that the above actions be completed within 90 days of cessation of regulated operations, in your case by September 5, 2007. To date Continuous Link Color has failed to submit a copy of the most recent emergency and hazardous chemical inventory form submitted to the State Emergency Response Commission, including a statement indicating whether any asbestos-containing materials are present at the facility, the most current hazardous chemical list, and a written CRO certification provided on the form prescribed by the director (Regulated Substances & Equipment Removal 90-Day Form, EPA 0329) and failed to remove all regulated substances from the facility, in violation of OAC rule 3745-352-20(A)(2).

Mr. Dan Combs  
Continuous Link Color Inc.  
October 1, 2007  
Page 2

- Continuous Link Color must immediately do the following: 1) legally remove all regulated substances from the facility and send Ohio EPA documentation that this has been done such as photos, waste manifests or bills of lading, and any other documentation deemed appropriate, 2) prepare, complete and submit your CRO certification provided on the form prescribed by the director (Regulated Substance & Equipment Removal 90-Day Form, EPA 0329).

Please remove all regulated substance from the facility and submit the requested documentation demonstrating abatement of the above violation to the Southwest District Office within 30 days of receipt of this letter. You can find copies of the laws and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm). If you should have any questions, please feel free to call me at (937) 285-6081.

Sincerely,



Steven Roth, P.E.  
Environmental Specialist  
Division of Hazardous Waste Management

cc: Butler County LEPC  
City of Fairfield Fire Department  
Ralph McGinnis, CAS, DHWM/CO

SR/plh



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Chris Korleski, Director

June 18, 2007

Mr. Dan Combs  
Continuous Link Color, Inc.  
4820 Industry Drive  
Fairfield, Ohio 45014

**Re: Continuous Link Color Inc.; Butler County; CRO**

Dear Mr. Combs:

On June 7, 2007 Ohio EPA inspected Continuous Link Color, Inc., at 4820 Industry Drive in Fairfield, Ohio. We inspected Continuous Link Color to determine its compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found in Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). During this inspection you represented Continuous Link Color and I represented Ohio EPA. This letter will explain the violations we found and what Continuous Link Color must do to correct the violations.

**Notice of Violation**

Based upon the information submitted to the Ohio State Emergency Response Commission, in 2005 Continuous Link Color was conducting regulated operations and was thus subject to Ohio's cessation of regulated operations (CRO) laws, OAC 3745-352, when regulated operations ceased on or around March 2006. We have found Continuous Link Color is in violation of the following CRO laws.

- (1) OAC 3745-352-20(A)(1), What are my responsibilities if I am an owner or operator?** No later than thirty days after cessation of regulated operations, you must submit a notice of cessation of regulated operations to the director, the local emergency planning committee, and the fire department using form EPA 0327, secure the facility in accordance with rule 3745-352-30 of the OAC, and designate a contact person for the facility in accordance with rule 3745-352-40 of the OAC.

On or about March 2006, Continuous Link Color ceased operations at 4820 Industry Drive in Fairfield Ohio. To date Continuous Link Color has failed to submit the required CRO notice, has failed to provide the required security, and has failed to designate a contact person, in violation of OAC 3745-352-20(A)(1).

COMBS.SR.WPD

→ Continuous Link Color must immediately prepare and submit on form EPA 0327 the required notice of cessation of regulated operations to the Division of Hazardous Waste Management - Compliance Assurance Section, the Butler County Emergency Management Agency, and the local fire department. Additionally, you must designate a contact person for the facility and establish security of the facility in accordance with OAC 3745-352-30. OAC 3745-352-30 requires you to provide an acceptable entry barrier(s), post warning signs and maintain and verify security measures through weekly inspections. Please submit documentation which clearly demonstrates the necessary actions have been taken and the violation abated.

- (2) **OAC 3745-352-20(A)(2), What are my responsibilities if I am an owner or operator?** Within 90 days of ceasing regulated operations, you must submit a copy of the most recent chemical inventory form submitted to the State Emergency Response Commission in accordance with ORC §3750.08, including a statement indicating whether any asbestos-containing materials are present at the facility. You must also submit a copy of the most current hazardous chemical list (or MSDSs) that you are required to have on file with the State Emergency Response Commission under ORC §3750.07. You must also submit a list and location of every stationary item on site that contains or is contaminated with a regulated substance, including an identification of the regulated substance in each. You must also legally remove from the facility all regulated substances and all debris, nonstationary equipment and furnishings, nonstationary containers, and motor vehicles and rolling stock that contain or are contaminated with regulated substances.

On or about March 2006, Continuous Link Color ceased operations at 4820 Industry Drive in Fairfield Ohio. Continuous Link Color failed to submit a copy of the most recent emergency and hazardous chemical inventory form submitted to the State Emergency Response Commission, including a statement indicating whether any asbestos-containing materials are present at the facility, the most current hazardous chemical list, and a written CRO certification provided on the form prescribed by the director (Regulated Substances & Equipment Removal 90-Day Form, EPA 0329) and failed to remove all regulated substances from the facility within 90 days of cessation of regulated operations, in violation of OAC rule 3745-352-20(A)(2).

→ Continuous Link Color must immediately do the following: 1) legally remove all regulated substances from the facility and send Ohio EPA documentation that this has been done such as photos, waste manifests or bills of lading, and any other documentation deemed appropriate, 2) prepare, complete and

Mr. Dan Combs  
Continuous Link Color, Inc.  
June 18, 2007  
Page 3

submit your CRO certification provided on the form prescribed by the director (Regulated Substance & Equipment Removal 90-Day Form, EPA 0329).

Our Central Office has reviewed the material safety data sheets provided for the product material (WSR-300, CT-243, CT-246, CT-249, CT-251) remaining on-site. They have determined the product material is classified as a regulated substance and is therefore subject to CRO laws and must be legally removed from the facility along with all other remaining regulated substances.

Please submit the requested documentation demonstrating abatement of the above violations to the Southwest District Office within 30 days of receipt of this letter. You can find copies of the laws and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm). If you should have any questions, please feel free to call me at (937) 285-6081.

Sincerely,



Steven Roth, P.E.  
Environmental Specialist  
Division of Hazardous Waste Management

cc: Butler County LEPC  
City of Fairfield Fire Department  
Ralph McGinnis, CAS, DHWM/CO

SR/br

**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.



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

For Ohio EPA use only

E-mail this completed form to  
[tammy.mcconnell@epa.state.oh.us](mailto:tammy.mcconnell@epa.state.oh.us) or mail it to Tammy  
McCConnell, Central Office

Site EPA ID No.	EPA ID Number:							
Site Name	Name: Continuous Link Color Inc.					Website: (Optional)		
Site Location Information	Street Address: 4820 Industry Drive							
	City, Town, or Village: Fairfield					State: OH		
	County Name: Butler					Zip Code: 45014		
Site Land Type (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"/>
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>								
Facility Representative  Additional names can be recorded in number 12  Only provide address information if it is different than the site address	First Name:			MI:		Last Name:		
	Phone Number:				Phone Number Extension:			
	E-Mail Address:							
	Fax Number:				Fax Number Extension:			
	Street or P.O. Box:							
	City, Town or Village:							
	State:				Country:		Zip Code:	
	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							
Name of Site's Legal Owner: Continuous Link Color Inc.					Date Became Owner (mm/dd/yyyy): 07/16/2001			
Owner Type:	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"/>
Street or P.O. Box: 4820 Industry Drive								
City, Town or Village: Fairfield					Owner Phone #:			
State: Ohio					Country: USA		Zip Code: 45014	
Name of Site's Operator:					Date Became Operator (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:					Operator Phone #:			
State:					Country:		Zip Code:	
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
Type of Generator								
<input checked="" type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator				
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste				
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator				
<input type="checkbox"/> Small Quantity Generator (SQG)								
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)								
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste								

Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))			
<input type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	
<input type="checkbox"/> Destination Facility for Universal Waste			
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
<b>Managed</b>		<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
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 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.			
Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.			
Announced	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Additional Facility Representatives:  Dan Combs is the caretaker of this site. Mr. Combs is a former Continuous Link Color Inc. employee. Currently, Mr. Combs works for Cork Industries.
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments: CRO Inspection. CRO violations cited.
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Name of Inspector(s) Steven Roth		Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 06/07/2007 09:30
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)

## CESSATION OF REGULATED OPERATIONS CHECKLIST

<input checked="" type="checkbox"/> Permanent Cessation	<input type="checkbox"/> Temporary Discontinuation	<input type="checkbox"/> Requesting Waiver for Temporary Discontinuation
---------------------------------------------------------	----------------------------------------------------	--------------------------------------------------------------------------

Company: Continuous Link Color Inc. EPA ID#: \_\_\_\_\_  
 Street: 4820 Industry Drive City: Fairfield  
 County: Butler State: Ohio Zip: 45014

Mailing Address: \_\_\_\_\_  
 (If different from above)

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Owner/Operator: Continuous Link Color Inc.

Street: 4820 Industry Drive City: Fairfield  
 County: Butler State: OH Zip: 45014

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Contact Person: TBD

Street: \_\_\_\_\_ City: \_\_\_\_\_

County: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

If the following applies, check the appropriate box and provide information:

<input type="checkbox"/> Holder of First Mortgage	<input type="checkbox"/> Fiduciary	<input type="checkbox"/> Receiver	<input type="checkbox"/> Indenture Trustee
---------------------------------------------------	------------------------------------	-----------------------------------	--------------------------------------------

Name: \_\_\_\_\_

Street: \_\_\_\_\_ City: \_\_\_\_\_

County: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Inspection Date(s): June 7, 2007 Time(s): 9:30 am

Inspection Announced:  YES  NO If so, how much advance notice given?: 2 Day

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone Number</u>
Inspectors:	<u>Steven Roth</u>	<u>Ohio EPA</u>	<u>937-285-6081</u>
Facility Rep(s)	<u>Dan Combs</u>	<u>Cork Industries</u>	<u>513-253-6033</u>
	_____	_____	_____
	_____	_____	_____

**30-DAY REQUIREMENTS**

1. Did the owner/operator of the reporting facility submit a notice of the cessation of all regulated operations (CRO) on a form prescribed by the Director to the following within 30 days of CRO? [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a) ]
- a. Director of Ohio EPA Yes\_\_ No  N/A\_\_ RMK# 1
- b. Local Emergency Planning Committee Yes\_\_ No  N/A\_\_ RMK# 1
- c. Local Fire Department Yes\_\_ No  N/A\_\_ RMK# 1
2. Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c) ] Yes\_\_ No  N/A\_\_ RMK# 1
3. Did the owner/operator include the following information about the contact person? [ORC §3752.05(B) and OAC rule 3745-352-35(B)] Yes\_\_ No  N/A\_\_ RMK# 1
- a. Address of principal office of the owner/operator. Yes\_\_ No  N/A\_\_ RMK# 1
- b. Business or residence address. Yes\_\_ No  N/A\_\_ RMK# 1
- c. Telephone number of contact person. Yes\_\_ No  N/A\_\_ RMK# 1
4. Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)] Yes\_\_ No\_\_ N/A  RMK# \_\_\_\_\_
5. If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)] Yes\_\_ No\_\_ N/A  RMK# \_\_\_\_\_

**NOTE:** The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See pp 5-6 of this checklist.

**REMARKS**

RMK# 1) On or about March 2006 Continuous Link Color ceased operations at 4820 Industry Drive in Fairfield Ohio. To date Continuous Link Color has failed to submit the required CRO notice, has failed to provide the required security, and has failed to designate a contact person.

**90-DAY REQUIREMENTS [ORC §3752.06]**

1. Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)] Yes\_\_\_ No  N/A\_\_\_ RMK# 2

**NOTE:** The owner/operator may receive approval from the Director to extend the 90-day period. [ORC §3752.06(B) and OAC rule 3745-352-20(A)(3)]

2. Does the owner/operator hold a **valid** hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(g)] Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

**NOTE:** If so, the owner/operator is not subject to CRO for its hazardous waste and must instead comply with the hazardous waste requirements.

Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_\_\_

3. Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)] Yes\_\_\_ No  N/A\_\_\_ RMK# 2

4. Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)] Yes\_\_\_ No  N/A\_\_\_ RMK# 2

5. Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(c)] Yes\_\_\_ No  N/A\_\_\_ RMK# 2

6. Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d)] Yes\_\_\_ No  N/A\_\_\_ RMK# 2

7. Did the owner/operator do the following?

a. Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(c)(i)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

OR

b. Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

OR

c. Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

8. Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

9. Did the owner/operator do the following:

a. Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(c)(i)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

OR

b. Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

OR

c. Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)]

Yes\_\_\_ No  N/A\_\_\_ RMK#\_\_\_\_\_

#### REMARKS

RMK# 2)

On or about March 2006 Continuous Link Color ceased operations at 4820 Industry Drive in Fairfield Ohio. Continuous Link Color failed to submit a copy of the most recent emergency and

hazardous chemical inventory form submitted to the State Emergency Response Commission, including a statement indicating whether any asbestos-containing materials are present at the facility, the most current hazardous chemical list, and a written CRO certification provided on the form prescribed by the director (Regulated Substances & Equipment Removal 90-Day Form, EPA 0329) and failed to remove all regulated substances from the facility within 90 days of cessation of regulated operations.

**SECURITY & WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]**

1. Did the owner/operator secure the facility against unauthorized entry using one or more of the following as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?
- a. Boarded, locked or used other means to secure all windows, doors and other potential means of entry? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_
  - b. Fencing? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_\_\_
  - c. Lighting and a surveillance system? Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_
  - d. Guard or security service? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_\_\_
  - e. Notarized statement from the county sheriff's department or the local police stating that the security measures secure against unauthorized entry? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_\_\_
  - f. Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry? Yes \_\_\_ No \_\_\_ N/A  RMK# \_\_\_\_\_
2. Did the owner/operator post the appropriate warning signs in the following fashion within 30 days of CRO? [ORC §3752.07(A) and OAC rule 3745-352-20(A)(1)(b)]:
- a. Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] Yes \_\_\_ No  N/A \_\_\_ RMK# 2
  - b. Are warning signs posted on, or reasonable proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)] Yes \_\_\_ No  N/A \_\_\_ RMK# 2
  - c. Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK# 2
  - d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK# 2
  - e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK# 2

3. Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]

- a. Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)] Yes\_\_ No  N/A\_\_ RMK# 2
- b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)] Yes\_\_ No  N/A\_\_ RMK# 2
- c. Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)] Yes\_\_ No  N/A\_\_ RMK# 2

**REMARKS**

RMK# 2) On or about March 2006 Continuous Link Color ceased operations at 4820 Industry Drive in Fairfield, Ohio. To date Continuous Link Color has failed to submit the required CRO notice, has failed to provide the required security, and has failed to designate a contact person.

**ADDITIONAL MULTI-MEDIA QUESTIONS**

If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply.

- 1. If the facility has an U.S. EPA I.D. number, has the facility submitted a *Change of Generator Activity Status* form? Yes\_\_ No<sup>1</sup>
  
- 2. Were there any <90 day accumulation units for hazardous waste? Yes\_\_ No   
  
List where unit(s) were/are: The HW Storage Building and trailer pad between Bldg A and the Powerhouse
  
- 3. Did the owner/operator close his facility in a manner that: [OAC 3745-66-11]
  - a. Minimizes the need for further maintenance? Yes\_\_ No\_\_ N/A  RMK#\_\_
  
  - b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? Yes\_\_ No\_\_ N/A  RMK#\_\_
  
  - c. Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04? Yes\_\_ No<sup>2</sup>\_\_ N/A  RMK#\_\_
  
- 4. During the partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10? Yes\_\_ No<sup>2</sup>\_\_ N/A  RMK#\_\_
  - a. Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code? Yes\_\_ No\_\_ N/A  RMK#\_\_

Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos>.

- 5. Will any buildings be demolished? If yes: Yes\_\_ No   
  
Has a *Notification of Demolition and Renovation* form been submitted? Yes<sup>3</sup>\_\_ No<sup>4</sup>

6. Are there any wells on the property? Yes<sup>5</sup> \_\_\_ No

If yes, where are the wells?

\_\_\_\_\_

What are the wells used for?

\_\_\_\_\_

\_\_\_\_\_

7. Is there open dumping of solid waste on the property? Yes<sup>6</sup> \_\_\_ No

**REMARKS**

None.

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1. In lieu of the facility now submitting a form, the inspector should submit a copy of the final CRO letter to Central Office's Regulatory and Information Services for I.D. deactivation.

2. Supply the facility with the requirements for generator closure and tell them they must close the unit and have documentation that closure was completed (LQGs only).

3. Check with the appropriate agency to determine if a form has been received.

4. Supply the facility with a form and contact the appropriate agency stating that demolition will occur.

5. If used for drinking water, let DDAGW know about the well.

6. Let DSIWM know about the open dumping of solid waste.

