



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911

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www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

February 5, 2007

Mr. Steven J. Brandeberry
Facility Engineer
Johnson Welded Products
625 South Edgewood Avenue
Urbana, Ohio 43078

RE: COMPLIANCE EVALUATION INSPECTION, Johnson Welded Products

Dear Mr. Brandeberry:

The Director of the Ohio EPA received a notice of voluntary disclosure of noncompliance pursuant to Ohio Revised Code (ORC) 3745.72 (C), dated October 31, 2006. The disclosure identified in part, noncompliance with hazardous waste management standards at Johnson Welded Product's (JWP) facility in Urbana, Ohio. The disclosure was made as the result of a recent environmental audit.

As a follow-up to the notice of voluntary disclosure Joe Miller and I visited JWP's facility on December 21, 2006 and meet with Truman Johnson and yourself and conducted a Hazardous Waste Compliance Inspection. On January 31, 2007 I visited your facility again in order meet with your consultant Melody Pieper, Harmony Environmental to gather more information and discuss the inspection findings.

The purpose of my visit was to assess the level of JWP's compliance with State and Federal regulations governing the management of hazardous waste. The inspection consisted of an examination of the facility's hazardous waste generation points and storage areas, and review of applicable hazardous waste management records. For your information I have attached a copy of the checklists used to complete the inspection. Ohio EPA has determined that JWP has violated the following state hazardous waste regulation:

1. **Accumulation Time of Hazardous Waste, OAC 3745-52-34(D)(5)(b)**: The generator must post the following information next to the phone:
 - (i) The name and telephone number of the emergency coordinator;
 - (ii) Location of fire extinguishers and spill material, and, if present, fire alarms(s); and
 - (iii) The telephone number of the fire department, unless the facility has a direct alarm

JWP failed to comply with this rule in that the required information is not posted next to a facility phone in case of a emergency. To return to compliance JWP must post the

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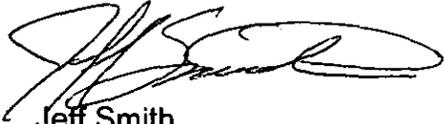
above information by a facility phone closest to the hazardous waste storage area. **Please submit documentation to this office for review correcting this violation within 30 days of receipt of this letter.**

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find 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. And, you may possibly reduce your regulatory requirements.

During the inspection, we observed potential P2 opportunities associated with your waste rags used around the shop. P2 options that you may want to evaluate for this operation include having the rags sent off for cleaning and reuse.

Should you have any questions, please feel free to call me at (937)285-6070. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Jeff Smith
District Representative
Division of Hazardous Waste Management

Enclosures

cc: Melody Pieper, Harmony Environmental
Stephen Samuels, Schottenstein, Zox & Dunn

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.

