



State of Ohio Environmental Protection Agency

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Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

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

February 26, 2008

Re: 2nd Notice of Violation
American Showa
OHD 084 746 932
Clinton County
SQG

Ms. Judy Filson
American Showa Inc
960 Cherry St.
Blanchester, Ohio 45107

Dear Ms. Filson,

Ohio EPA is in receipt of Showa's letter dated November 27, 2007 responding to Ohio EPA's notice of violation (NOV) letter dated November 2, 2007. American Showa's letter describes how a violation and general concern were addressed. On January 30, 2008 Ohio EPA conducted a return to compliance (RTC) inspection to determine if the violation and general concern had been abated and adequately addressed.

Based on our inspection American Showa has not adequately abated the violation or adequately addressed the general concern as noted in Ohio EPA's November 2, 2007 NOV. In order to abate this violation and address this general concern American Showa should follow Ohio EPA's recommendations as provided below and should provide a letter explaining how each was addressed.

**Used oil storage requirements
OAC 3745-279-22 (B) (2)**

This rule requires that containers and aboveground tanks used to store used oil at generator facilities must not be leaking.

American Showa's November 27, 2007 letter addresses this violation by stating that roll off containers which are used to hold used oil and scrap metal turnings were sealed to prevent leakage and that free liquid would be pumped off the roll offs daily. At the time of inspection January 30, 2008 Ohio EPA noticed that the roll offs had been modified, but also noted that used oil appeared to be mixing with



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rainwater in the dock area indicating that used oil is still be releasing from the roll offs into the dock area. Therefore American Showa remains in violation of OAC 3745-279-22 (B) (2) for failing to prevent the roll offs from leaking used oil.

To abate this violation, upon receipt of this letter, begin documenting a daily inspection of the roll containers to note if they are leaking and to note when they are pumped off. If you note they are still leaking take further action to prevent leaking. Continue inspections for 90 days. Within 30 days of this letter provide a written explanation describing how you have abated this violation.

General Concern 1

Ohio EPA had noted that American Showa was routinely utilizing the dock area and trench drains to accumulate used oil.

American Showa's November 27, 2007 letter addresses this general concern by stating that if any used oil leaks from the roll offs to the dock area it will be removed immediately. At the time of inspection January 30, 2008 it appeared that used oil and storm water had accumulated in the dock area.

To address this concern, upon receipt of this letter, begin documenting a daily inspection of the trench drain to note if used oil is accumulated there and to note when and how much used oil is pumped from there. Continue inspections for 90 days. Within 30 days of this letter provide a written explanation describing how you have abated this violation.

During the RTC inspection on January 30, 2008 Ohio EPA noted the following general concern. Within 30 days of this letter provide a written explanation how Showa plans to address this concern.

General Concern 2-

At the time of inspection on January 30, 2008 the loading dock had accumulated a large volume of storm water which then became contaminated with used oil from the process of metal shaving waste storage. You stated that this mixture would be hauled and treated. Please provide any records for the last 2 years related to transport and off site treatment of used oil contaminated storm water resulting from storm water run on to the dock. These records should show dates, volumes, destination, and method of treatment. Ohio EPA recommends preventing run on to the dock to prevent the generation of waste contaminated used oil and water mixtures. As mentioned in Ohio EPA's November 2, 2007 NOV the dock area



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should not be used to accumulate liquids.

If you have any questions about this letter please contact me at (937)285-6082.
Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve you from having to comply with all applicable regulations.

Sincerely,



Brian Gitzinger
District Representative
Division of Hazardous Waste Management

cc: ; Dinah Crawford, DHWM, SWDO

BG/ca

