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State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

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

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

November 2, 2007

Re: 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,

On October 19, 2007 Ohio EPA investigated a complaint at American Showa located at 960 Cherry St. in Blanchester, Ohio. A comprehensive inspection to determine compliance with **all** of Ohio's hazardous waste laws and regulations, as found under the Ohio Revised Code (ORC) and the Ohio Administrative Code (OAC) was not conducted.

During the investigation Ohio EPA found the following violation and general concern. **Within 30 days** of this letter American Showa should follow Ohio EPA's recommendations to abate the violation and general concern and should provide a letter to this office describing how each was abated.

**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.

At the time of inspection Ohio EPA noted that American Showa was allowing used oil to leak from roll off containers which held used oil and metal turnings. Therefore at the time of inspection October 19, 2007 American Showa was in violation of OAC 3745-279-22 (B) (2) for failing to prevent leaking of used oil from the roll off containers.

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General Concern

Ohio EPA also noted that American Showa was routinely utilizing the dock area and trench drains to accumulate used oil. You stated that used oil is accumulated there until it is removed. Ohio EPA is concerned that if the area is used to accumulate used oil, then the area would be considered an underground storage tank and is subject to underground storage tank standards Chapter 1301:7-9 of the Ohio Administrative Code. In order to avoid being subject to these standards American Showa should prevent used oil from accumulating in the dock area and trench drains by immediately pumping it from the trench drain to another container or tank, and by preventing it from being released to the trench drain.

This concludes the results of our complaint investigation. 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. If you have any questions about how to comply with this letter or other regulations please contact me at (937)285-6082.

Sincerely,



Brian Gitzinger
District Representative
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM, SWDO

BG/cja

