



State of Ohio Environmental Protection Agency

New
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2008
C.B.P. CAP
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BG
File

Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

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

November 7, 2008

Ms. Judy Filson
Safety & Health Assistant Manager
American Showa Inc.
960 Cherry Street
Blanchester, Ohio 45107

**Re: Return to compliance American Showa, SQG, OHD 084 746 932,
Clinton County**

Dear Ms. Filson,

On October 27, 2008 Ohio EPA conducted a return to compliance (RTC) inspection to ensure all violations and general concerns noted in Ohio EPA's July 25, 2008 Notice of Violation (NOV) letter had been abated.

Paul Pardi, Brian Marlatt and I represented Ohio EPA. Jim Magee, LoAnn Burt, and you represented Showa.

During the meeting Jim Magee and you explained that Showa had improved the scrap metal collection and storage process at the facility in order to prevent used oil violations. In summary the conveyor system which had been used to load scrap metal into the roll offs and its sump pit which had collected used oil is no longer operated. Scrap metal is now being transferred from redesigned smaller bins to the roll offs using forklifts. Showa had cleaned up all used oil that had been released to the dock area; was no longer using the lower dock area to accumulate used oil; had filled in the lower trench drains of the dock with concrete; and provided continuous pumping of used oil from the roll offs. Based on our inspection October 27, 2008 Showa has demonstrated abatement of all violations and concerns cited in Ohio EPA's November 2, 2007, February 26, 2008 and July 25, 2008 NOVs. As a follow up, please report to this office after 60 days explaining if the improvements remain effective in preventing used oil leakage from the roll offs. Ohio EPA recommends that Showa consider taking the following additional measures.

- 1) Perform and document regular inspections at intervals necessary to ensure used oil is not leaking from the roll offs nor accumulating in the lower dock area.
- 2) Provide a spill kit in the dock area.

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Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Showa from having to comply with all applicable regulations. If you wish to discuss this letter, please feel free to call me at (937) 285-6082.

Sincerely,



Brian Gitzinger
District Representative
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM, SWDO
Paul Pardi, DHWM, SWDO
Brian Marlatt, DHWM, SWDO

BG/plh