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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**MR JACK DUNIVAN
FACILITIES MANAGER
GAYSTON CORPORATION
200 SOUTH PIONEER BLVD
SPRINGBORO OH 45066**

2. Article Number
(Transfer from service label)

7006 2760 0003 0780 8905

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Renee Genette Agent
 Addressee

B. Received by (Printed Name)

Renee Genette

C. Date of Delivery

11-10-09

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STATE OF OHIO EPA
SOUTHWEST DISTRICT OFFICE
ATTN: JEFF STARK - DHWM
401 EAST FIFTH ST
DAYTON OH 45402

1127





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

November 6, 2009

Re: Gayston Corporation
Large Quantity Generator
OHD982068579
Warren County

Mr. Jack Dunivan
Facilities Manager
Gayston Corporation
200 South Pioneer Boulevard
Springboro, Ohio 45066

Certified Mail

Subject: Hazardous Waste Compliance Evaluation Inspection (CEI), Notice of Violation/Partial Return to Compliance

Dear Mr. Dunivan:

On October 27, 2009, Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection (CEI) of Gayston Corporation (Gayston) located at 200 South Pioneer Boulevard, in Springboro, Ohio. As is our practice, my inspection was unannounced. You represented Gayston, Mitch Brown and Jennifer Leverett represented Crown Solutions and I represented Ohio EPA. Gayston's hazardous waste generator identification number is OHD982068579. Ohio EPA identified that Gayston is operating as a large quantity generator of hazardous waste. The Gayston facility manufactures various products including ordnance components, ferrous and non-ferrous forgings.

The inspection was conducted to determine your compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Ohio EPA's CEI included an inspection of the facility operations and a review of written documentation and records. This letter will explain the violations I found, what you need to do to correct the violations, other general concerns I have, and some general pollution prevention information.

On October 28, 29, and November 3, 2009 this office received your responses to Ohio EPA's October 27, 2009 CEI of Gayston Springboro, Ohio facility. The documentation you submitted included a hazardous waste manifest, a land disposal restriction form, additional information concerning hazardous waste storage, a material safety data sheet of material used in the parts washer located in the tool room, and additional information

Mr. Jack Dunivan, Facilities Manager
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regarding the operation of the skimmer on anodizing tank #1. This documentation along with the CEI conducted on October 27, 2009 was used to assess compliance with Ohio's hazardous waste laws.

A. VIOLATIONS

The following violations of Ohio's hazardous waste laws were identified. In order to correct these violations you must do the following and send me the required information **within 30 days** of your receipt of this letter:

1. ORC 3734.02 (E)(2) and (F), OAC 3745-52-34, Treatment, Storage, Disposal, state in part:

(E)(2) No person shall establish or operate a hazardous waste facility for the storage, treatment, or disposal of any hazardous waste, without a hazardous waste facility installation and operation permit issued in accordance with section 3734.05 of the Revised Code.

(F) No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to any permitted hazardous waste facility.

According to OAC 3745-52-34 (B) a generator who, for more than ninety days, accumulated and/or conducts treatment of hazardous waste that is generated on-site is an operator of a storage and/or treatment facility.

The October 27, 2009 inspection revealed Gayston accumulated hazardous waste in excess of ninety days. The following three hazardous waste containers were being stored for greater than ninety days:

- Two (2) totes containing anodize pit waste located in the Lube Room, accumulation start date July 28, 2009.
- One (1) tote containing phosphoric acid waste (Lynx 6200 cleaner) located near the Drying Queue, accumulation start date July 28, 2009.

From the accumulation start date of July 28, 2009 to when the three hazardous waste totes were picked up on October 28, 2009 (Manifest Tracking Number 006404156), these three totes were stored in excess of ninety days (92 days total storage time). The totes were in good condition and no leakage/spillage was evident in the area in which the containers were being stored. However, Gayston stored hazardous waste without a hazardous waste installation and operation permit or a permit by rule, in violation of ORC §3734.02 (E) and (F) and OAC 3745-52-34.

Since Gayston violated ORC 3734.02 (E) and (F), Gayston is subject to all applicable general facility standards found in OAC Chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Gayston begin facility-wide cleanup pursuant to the Corrective Actions process under Ohio Law.

Please note: During the October 27, 2009 inspection, Ohio EPA was made aware that there were delays in profiling of the hazardous waste from the anodize line which lead to totes being stored at Gayston for greater than ninety days. OAC Rule 3745-52-34 (B) does allow the generator a thirty-day extension to the ninety-day period. Such extension, of up to thirty days, may be granted at the discretion of the Ohio EPA on a case-by-case basis if hazardous waste must remain on-site for longer than ninety days due to unforeseen, temporary, and uncontrollable circumstances. Gayston did not apply for a thirty-day extension to the ninety-day period for any of the three totes listed above.

Gayston must ensure that hazardous wastes are not accumulated for greater than ninety days. As noted by you in your October 28, 2009 letter, you indicated that Gayston should have requested a thirty-day extension, but it was your facility's "intent to ship right at 90 days." This is not an acceptable procedure to ship hazardous waste at the end of a ninety-day storage limit. Please submit documentation which outlines the procedures that will be implemented by Gayston to ensure that storage longer than ninety days will not reoccur.

2. OAC 3745-52-34 (C)(1)(b), Accumulation time of hazardous waste:

Hazardous waste satellite accumulation containers must be marked with the words "Hazardous Waste" or other words that identify the contents of the containers.

Within the anodize process area of the facility, there was one unmarked five gallon white satellite bucket of phosphoric acid waste. The satellite container was not labeled with the words "Hazardous Waste" or with other words describing the contents of the container, in violation of OAC 3745-52-34 (C)(1)(b).

On October 27, 2009, Gayston abated this violation by removing the satellite container. The contents of the container was placed into the larger 55 gallon anodize hazardous waste drum. Gayston is no longer in violation of OAC Rule 3745-52-34.

3. OAC Rule 3745-65-53, Required aisle space:

The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of the above-mentioned purposes.

During the inspection, aisle space between the hazardous waste totes located in the Lube Room of the facility was obstructed. The containers were too close to one another to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment within the hazardous waste storage area, in violation of OAC Rule 3745-65-53.

To return to compliance, please obtain adequate aisle space around the hazardous waste containers to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency. Please submit documentation to demonstrate Gayston has complied with this requirement.

4. OAC Rule 3745-66-74, Inspections:

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration by corrosion or other factors. The owner or operator must record inspections in an inspection log or summary. "Weekly" as defined by ORC §1.44 means seven consecutive days.

During the inspection a review of your 2007, 2008, and 2009 inspection records of the ninety-day hazardous waste storage areas was conducted. According to your records, weekly inspections have not been conducted in accordance with OAC Rule 3745-66-74. In some cases eight to fourteen days has elapsed in between inspections. Therefore, Gayston is in violation of OAC Rule 3745-66-74.

To return to compliance, please submit to Ohio EPA four weeks' worth of your container inspections starting with the week of October 25, 2009. In addition, please submit documentation which outlines the procedures that will be implemented by Gayston to ensure that hazardous waste containers will be inspected at least weekly.

5. OAC Rule 3745-66-73 (A): Management of Containers:

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

During the inspection, two containers located in the anodize process area were open: a 55 gallon poly drum and a five gallon white plastic container both containing phosphoric acid waste. The 55 gallon poly drum is normally used to collect hazardous waste from the anodizing tank however, at the time of the inspection the skimmer was not operational. The belt of the skimmer was in need of replacement. The skimmer was lying on top of the drum with the hose sticking down through the bung hole and into the container. Under normal operating conditions the skimmer is attached to the side of the anodizing tank. A second container, a five gallon white plastic bucket was hanging off of the anodizing

tank. The bucket contained hazardous waste and did not have a lid. Therefore, Gayston is in violation of OAC Rule 3745-66-73 (A).

On October 28, 2009, Gayston abated this violation. A new belt for the skimmer was installed and the skimmer was re-attached on the back of tank #1 of the anodize line. As long as hazardous waste is continuously being removed from the tank and added to the satellite accumulation drum, placing the hose of the skimmer into the container is acceptable. However, at any time hazardous waste is not being added or removed from the satellite accumulation container, the container must remain closed. In addition, the five gallon white plastic bucket was removed. The contents of this container was placed into the larger 55 gallon anodize hazardous waste drum. Gayston is no longer in violation of OAC Rule 3745-66-73 (A).

6. OAC Rule 3745-273-13 (D)(1), Waste Management – standards for small quantity handlers of universal waste:

A small quantity generator of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence or leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

During the inspection, it was observed that waste lamps were being stored in the Tool Crib area of the facility. Several waste lamps were being stored in cardboard boxes, however, several eight foot waste florescent lamps were not in any container, they were simply lying on top of another box containing waste lamps. Also, one large open cardboard box contained a variety of waste lamps. This is not an unacceptable method to manage waste lamps, Gayston is in violation of OAC Rule 3745-273-13 (D)(1).

In order to abate this violation, Gayston must immediately contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. All containers must remain closed. Please provide documentation (i.e. photograph) to demonstrate compliance with this rule.

7. OAC Rule 3745-273-14 (A), Labeling/markings – standards for small quantity handlers of universal waste:

Universal waste batteries (i.e., each battery), or a container in which batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste – Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

During the inspection, the one white plastic five gallon bucket containing waste batteries located in the Tool Crib area was not properly labeled, in violation of OAC Rule 3745-273-14 (A).

In order to abate this violation, Gayston must label or mark clearly each battery or a container in which batteries are contained with one of the above phrases. Please provide documentation (i.e. photograph) to demonstrate compliance with this rule.

8. OAC Rule OAC Rule 3745-273-14 (E), Labeling/markings – standards for small quantity handlers of universal waste:

Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

During the inspection, it appeared that none of the containers containing waste lamps were properly labeled, in violation of OAC Rule 3745-273-14 (E).

In order to abate this violation, Gayston must label or mark clearly each lamp or a container or package in which such lamps are contained with one of the above phrases. Please provide documentation (i.e. photograph) to demonstrate compliance with this rule.

B. GENERAL COMMENTS

1. Pollution Prevention

As discussed during the inspection, the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) provides answers and information to all businesses about environmental regulations, compliance, and pollution prevention. If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact OCAPP at (614) 644-3469 or refer to the following web site: <http://www.epa.state.oh.us/ocapp>.

2. Universal Waste

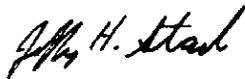
To assist Gayston in complying with the universal waste rules, I would like to take this opportunity to provide you with the following Ohio EPA Division of Hazardous Waste Management Guidance Documents for your review:

- "Universal Waste," December 2004
- "Universal Waste Rules for Handlers of Lamps," June 2005

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Please submit documentation demonstrating violations A3, A4, A6, A7, and A8 have been abated, e.g., cover letter, copies of relevant letters and procedures, photographs, manifests, inspection logs, etc., to Southwest District Office **within 30 days** of the date of this letter. For violation A1 please submit documentation which outlines the procedures that will be implemented by Gayston to ensure that storage of hazardous waste longer than ninety days will not reoccur. Enclosed you will find copies of the checklists that I completed during the inspection. Should you have any questions, please feel free to call me at (937) 285-6456. You can find a copy of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Jeffery H. Stark
District Representative
Division of Hazardous Waste Management

Enclosures: Ohio EPA DHWM Guidance Document, "Universal Waste Rules for Handlers of Lamps," June 2005
Ohio EPA DHWM Guidance Document, "Universal Waste," December 2004

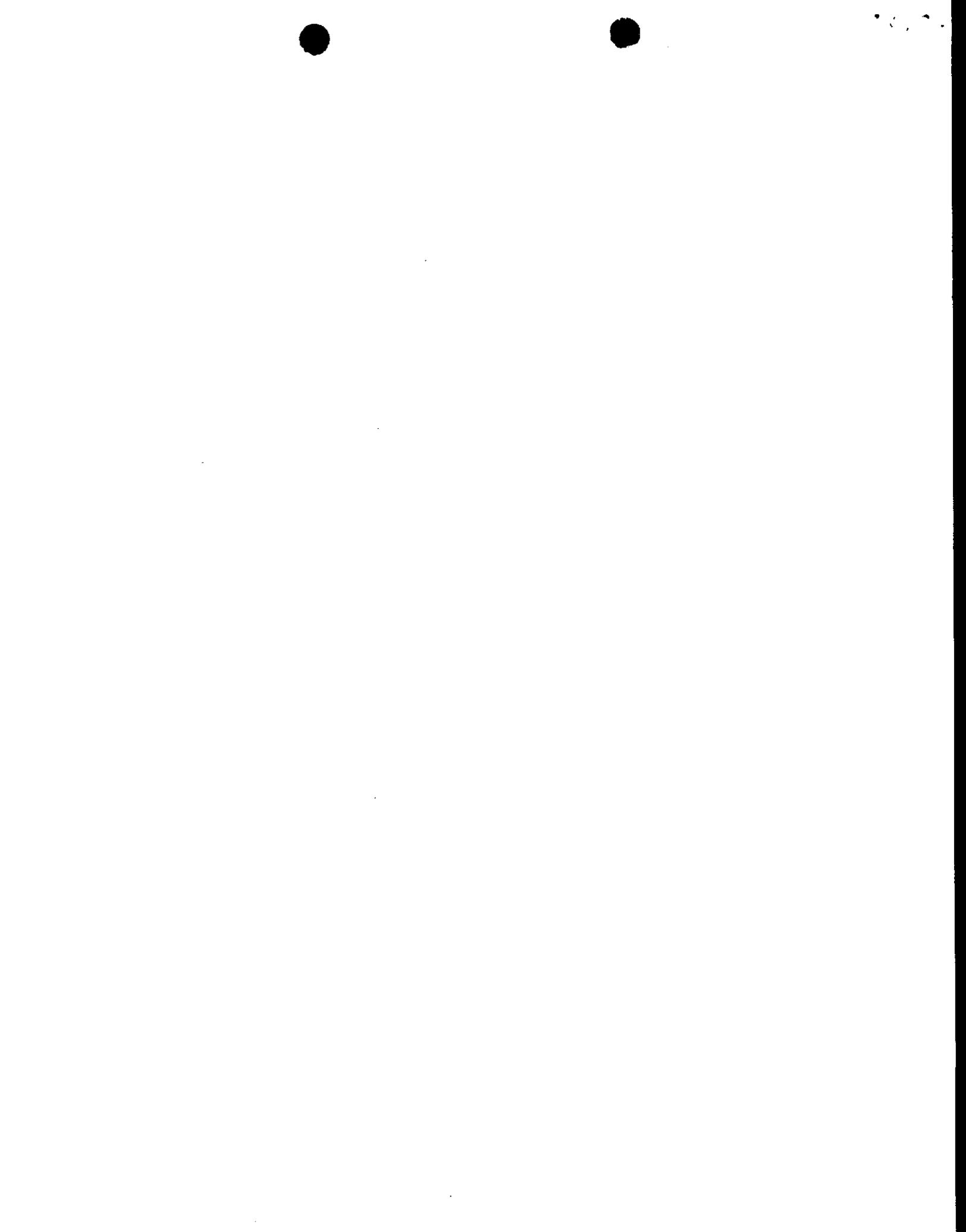
Checklists: Large Quantity Generator Requirements Checklist
Small Quantity Universal Waste Handler Requirements Checklist
Generator Land Disposal Restriction Checklist
Used Oil Inspection Checklist

cc: DHWM Data Entry/Facility 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.

JHS\bp



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

For Ohio EPA use only

E-mail this completed form to kristina.durnell@epa.state.oh.us
or mail it to Kristina Durnell, Central Office

Site EPA ID No. Site Name: Site Location Information Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	EPA ID Number: OHD 982 068 579 Name: Gayston Corporation		Website: www.gayston.com (Optional)	
	Street Address: 200 South Pioneer Boulevard City, Town, or Village: Springboro County Name: Warren		State: OH Zip Code: 45066	
	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"/>
	332112	332995		
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Jack		MI:	
	Last Name: Dunivan		Phone Number Extension:	
	Phone Number: (937) 806-2025		E-Mail Address:	
	Fax Number: (937) 746-2524		Fax Number Extension:	
	Street or P.O. Box: 200 South Pioneer Boulevard			
	City, Town or Village: Springboro			
	State: OH			
	Zip Code: 45066			
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: Gayston Corporation		Date Became Owner (mm/dd/yyyy):	
	Owner Type: <input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal
		<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
	Street or P.O. Box: 200 South Pioneer Boulevard			
	City, Town or Village: Springboro			
	State: OH			
	Name of Site's Operator: Jack Dunivan		Date Became Operator (mm/dd/yyyy):	
	Operator Type: <input checked="" type="checkbox"/> Private	<input type="checkbox"/> County	<input type="checkbox"/> District	<input type="checkbox"/> Federal
		<input type="checkbox"/> Municipal	<input type="checkbox"/> State	<input type="checkbox"/> Other
	Street or P.O. Box: 200 South Pioneer Boulevard			
	City, Town or Village: Springboro			
	State: OH			
	Operator Phone #:		United States	
	Zip Code: 45066			

VIOLATIONS CITED? Yes No

TYPE OF HANDLER— A MINIMUM OF ONE BOX MUST BE CHECKED

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

Recycler of Hazardous Waste
 Exempt Boiler and/or Industrial Furnace
 Underground Injection Control Facility
 Small Quantity On-Site Burner Exemption
 Hazardous Waste Transporter
 Smelting, Melting, Refining Furnace Exemption
 Treater, Storer or Disposer of Hazardous Waste

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

Small Quantity Handler of Universal Waste
 Destination Facility for Universal Waste
 Large Quantity Handler of Universal Waste
 (accumulates 5,000 kg. or more)

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

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.

D001	D002	D005	D006	D007	D008	D035
D039	F003	F005	F019			

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No
 Additional Facility Representatives: **Mitch Brown and Jennifer Leverett of Crown Solutions were also present during the CEI.**

Tanks Yes No
 Other Comments: **CEI conducted on 10/27/2009.**

Containers Yes No

Name of Inspector(s) _____ Name of Inspector(s) _____ Date of Inspection/Time (mm/dd/yyyy) (hh:mm) _____
Jeff Stark OEPA, DHWM, SWDO **10/27/2009 0900 - 1500**

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) _____

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Gayston Corporation Facility Type: LQG Date of Inspection: 10/27/2009 EPA ID#: OHD 982 068 579

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc)	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Chromic acid D002, D007	~ 512 #/month totes 290 day		EQ - Detroit Detroit, MI		
2	ion exchange tanks D007, F019	~ 167 #/month totes 290 day		US Filter Roseville, MSN		
3	Anodic Line Lynx 6200 cleaner (phosphoric acid) D002, D007	~ 605 #/month totes 290 day		Dynecol, Inc. Detroit, MI		
4	Painting and Screening paint booth filters screen printing debris D001, D005, D006, D008, D035, F003, F005	~ 250 #/month drums paint booth area 290 day		Rinco Ireton, AR		
5	Painting paint/solvent D001, D035, F003	~ 633 #/month drums 290 day		Rinco Ireton, AR		
6	Etching sodium hydroxide c tub D002, D007	~ 9365 #/month totes 290 day		Dynecol, Inc. Detroit, MI		

1. 1950-1951

2. 1952-1953

3. 1954-1955

4. 1956-1957

5. 1958-1959

6. 1960-1961

7. 1962-1963

8. 1964-1965

9. 1966-1967

10. 1968-1969

11. 1970-1971

12. 1972-1973

13. 1974-1975

14. 1976-1977

15. 1978-1979

16. 1980-1981

17. 1982-1983

18. 1984-1985

19. 1986-1987

20. 1988-1989

21. 1990-1991

22. 1992-1993

7		Waste Dyes D007	~1250 #/month		Dynecol, Inc. Detroit, MI		
8		Waste H. Sol D002, D007	~317 #/month		Dynecol, Inc. Detroit, MI		
9		Waste Sealers D007	~575 #/month		Dynecol, Inc. Detroit, MI		
10	Parts washer	Parts washer solvent D039	~13 #/month NA Tool Room		Safety Klean Systems Plano, TX		
11	Lighting	Waste Lamps UW	varies cardboard boxes Tool Crib		Retrofit Recycling Quatanna, MN		
12	Batteries	Waste Batteries UW	varies plastic buckets Tool Crib		Retrofit Recycling Quatanna, MN		

REMARKS-GENERAL INFORMATION

General Process Information:

Regulatory/Enforcement History (if applicable):

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

