



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 26, 2007

Thomas A. Day  
Director of Operations  
A-Brite Plating Co.  
3000 W. 121 St.  
Cleveland, OH 44111

**RE: A-BRITE PLATING, OHD004157913, CUYAHOGA COUNTY, LQG RTC**

Dear Mr. Day:

On October 25, 2007, this writer received A-Brite Plating Company (A-Brite's) response (dated October 24, 2007) to Ohio EPA's September 26, 2007 Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. Subsequently, on November 8, November 15, November 27, November 29, December 3 and December 21, 2007, I received additional compliance related information from you. The following is a summary of the status of the previously cited violations:

- 1. Personnel Training, OAC rule 3745-65-16(C)(D)(2)&(3):** A-Brite's responses included documentation that personnel training was conducted on December 8, 2007. Additionally, A-Brite submitted a copy of the training topics, sign-in sheet, and documentation verifying compliance with OAC rule 3745-65-16(D)(2)(3). **No further information is requested to abate this violation.**
- 2. OAC rule 3745-65-31, Maintenance and Operation:** This violation was previously abated.
- 3. OAC rule 3745-65-33, Testing and Maintenance of Emergency Equipment:** A-Brite's response included a completed inspection log for emergency equipment. **No further information is requested to abate this violation.**
- 4. OAC rule 3745-65-52(E), Content of Contingency Plan:** A-Brite's responses included a revised contingency plan. **No further information is requested to abate this violation.** Please be advised that the plan must be distributed to all emergency authorities pursuant to OAC rule 3745-65-53.
- 5. OAC rule 3745-66-73, Management of Containers:** This violation was previously abated.

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6. **OAC rule 3745-66-74, Inspections:** A-Brite's response included a completed inspection log for the hazardous waste roll-off box. **No further information is requested to abate this violation.**
7. **OAC rule 3745-279-22(C), Used Oil Storage Requirements:** This violation was previously abated.

Ohio EPA offers the following comments:

1. A-Brite indicated that its used oil will be shipped to Homan Oil Service (OHT400015053).
2. A-Brite indicated that its used fluorescent lamps will be managed as a universal waste and sent off-site to Veolia Environmental Services.
3. A-Brite conducted generator closure activities for the area where the hazardous waste roll-off box was previously located.
4. A-Brite characterized the spent blasting media from the maintenance area as a D008 hazardous waste. In the future, this waste stream will be re-evaluated.

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales  
Environmental Specialist  
Division of Hazardous Waste Management

FAZ:ddw

cc: Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO