



State of Ohio Environmental Protection Agency

Northeast District Office

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 2, 2008

Dino Dotsikas, President
American Metal Coatings
1088 Ivanhoe Road
Cleveland, OH 44110

**RE: AMERICAN METAL COATINGS, OH0000147868, CUYAHOGA COUNTY, RCRA/LQG,
COMPLIANCE EVALUATION INSPECTION, PARTIAL RETURN TO COMPLIANCE**

Dear Mr. Dotsikas:

Thank you for your November 29, 2007, and December 5, 2007 response to Ohio EPA's October 25, 2007 Partial Return to Compliance (PRTC) letter. American Metal Coatings (AMC) submitted information and documentation including:

- A statement from AMC indicating that the 4 steel containers referenced in Ohio EPA's October 25, 2007 PRTC letter were filled with concrete from a previous concrete repair job.
- A copy of the updated facility contingency plan dated September 2007.
- A copy of the sign in sheets and confirmation exams from the hazardous waste training performed on October 20, 2007.
- A list of employees at the facility that manage hazardous waste.
- A copy of the job titles and descriptions for positions which manage hazardous waste at the AMC facility.

My review of the submitted documentation reveals that AMC has adequately abated the following hazardous waste violations cited in Ohio EPA's July 9, 2007 NOV letter:

OAC Rule 3745-52-11 Hazardous waste determination

OAC 3745-65-16 Personnel training

OAC 3745-65-54 Amendment of contingency plan

OAC 3745-65-31 Maintenance and operation of facility

AMC remains in violation of the following hazardous waste violations until such time as the facility adequately demonstrates abatement of said violations:

1. **Ohio Revised Code (ORC) § 3734.02 (E) and (F) storage of hazardous waste without a facility installation and operation permit:**

By letter dated November 29, 2007, Ohio EPA received information and documentation indicating that AMC has characterized and shipped offsite at least sixty-one (61) containers of waste through Enviroserve. AMC also stated that any remaining hazardous waste on site is being managed properly and is being treated through the on-site facility WWTU.

No further action is required at this time.

Since AMC violated ORC §3734.02(E) and (F), AMC 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 AMC begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

2. **OAC 3745-65-52 (D and E) Content of contingency plan:**

By letter dated December 5, 2007 Ohio EPA received a copy of the updated facility hazardous waste contingency plan. My review of the plan finds the updated plan acceptable and Ohio EPA hereby approves said plan. AMC must send a copy of the updated contingency plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be requested to provide emergency services. AMC must document that this has been done and submit said documentation to this office.

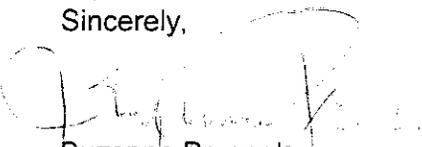
AMC must also train all employees involved in hazardous waste management at the facility in the updated facility contingency plan and submit documentation, in the form of signed and dated sign in sheets, to this office demonstrating that this has been done.

Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

Failure to list specific deficiencies in this communication does not relieve AMC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve AMC from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA
cc: Natalie Oryshkewych, DHWM, NEDO, OEPA