



State of Ohio Environmental Protection Agency

**Northeast District Office**

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

February 2, 2007

**RE: American Plastic Products LLC  
Stark County  
Complaint Inspection  
Used Oil Generator  
Notice of Violation**

Gary Zedell  
President/Owner  
American Plastic Products LLC  
2401 Shepler Church Ave SW  
Canton, OH 44706

Dear Mr. Zedell:

On January 23, 2007, this writer and John Paquelet, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited American Plastic Products LLC located at 2401 Shepler Church Avenue, Canton, Ohio. The purpose of the visit was to investigate a complaint received by Ohio EPA regarding the alleged mismanagement of used oil at your facility. You represented the facility.

The following represents Ohio EPA's findings:

American Plastic Products LLC is a manufacturer of plastic products by plastic injection molding. Ohio EPA understands that used oil is generated during the manufacturing process. The used oil accumulates in 55 gallon drums and plastic totes stored outside behind the building.

**Ohio EPA noted that the drums and totes storing used oil were not clearly marked with the words "USED OIL" as required by the Ohio Administrative Code (OAC) 3745-279-22 (C).**

**Please, within 30 days of the date of this letter, document to my attention that you have clearly marked all containers of used oil with the words "USED OIL." A digital photo(s) showing the used oil markings is acceptable documentation.**

During the inspection snow was on the ground so an adequate inspection of the soil beneath the drums, looking for spillage/release of used oil, could not be conducted at the time.

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American Plastic Products LLC  
February 2, 2007  
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Ohio EPA requires that a release of used oil onto soil is to be clean up until all visible contamination is removed. The used oil contaminated soil is to be disposed into a solid waste dumpster for off-site disposal to a licensed solid waste landfill.

The photo(s) can be e-mailed to my attention at [kris.coder@epa.state.oh.us](mailto:kris.coder@epa.state.oh.us), or mailed to my attention at Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

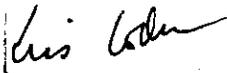
Please find the following, enclosed, technical guidance information:

- an April 2006, DHWM Guidance Document, "The Regulation of Used Oil: An Overview for Ohio Businesses Who Generate Used Oil" and;
- a June 2005, DHWM Guidance Document, "Universal Waste Rules for Handlers of Lamps."

Thank you for your cooperation in this matter. If you have any questions about this letter or the enclosed guidance information, please call me at (330) 963-1266 or John Paquelet at (330) 963-1246.

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

Sincerely,

  
Kris Coder  
Environmental Specialist  
Division of Hazardous Waste Management

KC:ci  
Enclosure

cc: Natalie Oryshkewych, NEDO, DHWM

ec: John Paquelet, NEDO, DHWM

Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only	
E-mail this completed form to <a href="mailto:tammy.mcconnell@epa.state.oh.us">tammy.mcconnell@epa.state.oh.us</a> or mail it to Tammy McConnell, Central Office			
Site EPA ID No.	EPA ID Number: NA		
Site Name	Name: American Plastic Products LLC	Website: (Optional)	
Site Location Information	Street Address: 2401 Shepler Church Ave SW		
	City, Town, or Village: Canton	State: OH	
	County Name: Stark	Zip Code: 44706	
Site Land Type (check only one)	Private x <input type="checkbox"/>	County y <input type="checkbox"/>	Distric t <input type="checkbox"/>
	Federal <input type="checkbox"/>	India n <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>	
NAICS code(s) <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	na		
Facility Representative	First Name: Gary	MI:	Last Name: Zedell
	Phone Number: 330-455-0991	Phone Number Extension:	
Additional names can be recorded in number 12	E-Mail Address: Amplasproducts@sbcglobal.net		
	Fax Number: 330-455-0759	Fax Number Extension:	
Only provide address information if it is different than the site address	Street or P.O. Box: Same as location		
	City, Town or Village:		
	State:	Country:	Zip Code:
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: Gary Zedell		unknown Date Became Owner (mm/dd/yyyy):
	Owner Type:	Private x <input 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"/>
	Street or P.O. Box: Same as location		
	City, Town or Village:		
	State:	Country:	Zip Code:
	Name of Site's Operator: same as owner		Date Became Operator (mm/dd/yyyy):
	Owner Type:	Private <input 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"/>
	Street or P.O. Box:		
	City, Town or Village:		Operator Phone #:
	State:	Country:	Zip Code:
Violations Cited?	X <input type="checkbox"/> Yes <input type="checkbox"/> No		
Type of Generator			
<input type="checkbox"/> Not Regulated	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator		
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> United States Importer of Hazardous Waste		
<input type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator		



<b>Universal Waste Activities (Indicate types of universal waste generated and/or accumulated (check all boxes that apply))</b>			
<input type="checkbox"/> <b>Small Quantity Handler of Universal Waste</b>		<input type="checkbox"/> <b>Large Quantity Handler of Universal Waste</b>	
<input type="checkbox"/> <b>Destination Facility for Universal Waste</b>		(accumulates 5,000 kg. or more)	
(Check all boxes below that apply for each of the three types of facilities above)		Used Oil Activities (Indicate Type(s) of Activity(ies))	
	<b>Managed</b>	<input checked="" type="checkbox"/> <b>Used Oil Generator</b>	<input type="checkbox"/> <b>Off-Specification Used Oil Burner</b>
<b>Batteries</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transporter</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil</b>
<b>Pesticides</b>	<input type="checkbox"/>	<input type="checkbox"/> <b>Used Oil Transfer Facility</b>	<input type="checkbox"/> <b>Used Oil Fuel Marketer to Off-Specification Used Oil Burner</b>
<p>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.</p>			
<p>Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</p>			
<b>Announced</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<b>Additional Facility Representatives:</b> none
<b>Tanks</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<b>Other Comments:</b> Complaint investigation; used oil violation noted abated on April 13, 2007.
<b>Containers</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<b>Name of Inspector(s)</b>		<b>Name of Inspector(s)</b>	<b>Date of Inspection/Time (mm/dd/yyyy) (hh:mm)</b>
Kris Coder		John Paquelet	January 23, 2007
<p>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.</p>			
<b>Signature of Owner, Operator, or an Authorized Representative</b>		<b>Name and Title (Print)</b>	<b>Date (mm/dd/yyyy)</b>

**Revised May 2007**