



**Environmental
Protection Agency**

Paul R. Gendron, Governor
Lee Fisher, Lt. Governor
Tommy Swadlow, Director

June 1, 2010

**RE: AMERICAN SPRING WIRE CORPORATION
OHD 042 708 586
CUYAHOGA COUNTY
RCRA/LQG
NOTICE OF VIOLATION/RETURN TO COMPLIANCE**

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Timothy E. Heppler
American Spring Wire Corporation
26300 Miles Road
Bedford Heights, Ohio 44146

Dear Mr. Heppler:

On May 5, 2010, Ohio EPA's Division of Hazardous Waste Management (DHWM) accompanied Donna Kniss and John Schmidt from Ohio EPA's Division of Surface Water on an audit conducted by Therese Schleiden from the City of Bedford Heights Department of Water Reclamation at American Spring Wire Corporation (ASW) located at 26300 Miles Road, in Bedford Heights, Ohio.

ASW tempers and manufactures steel spring wire and is a Large Quantity Generator (LQG) of hazardous waste. Hazardous waste streams generated at the facility include pickle liquor (D002, K062), waste pea coal (D008), stack cleaning sludge (D008), and waste paint related material (F003, F005, D001, D018, D035, D039, D040).

While on site, Ohio EPA DHWM took an opportunity to observe ASW's compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ('ORC' and 'OAC' respectively). ASW was represented by you while Ohio EPA DHWM was represented by me.

Ohio EPA's inspection included an inspection of the hazardous waste accumulation area. This was not a complete Compliance Evaluation Inspection (CEI).

Based on this inspection, Ohio EPA has determined that ASW has violated at least the following state hazardous waste regulations:

1. **OAC Rule 3745-52-34(A)(2) Accumulation date:** *A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on site without an Ohio hazardous waste permit, provided that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container.*

At the time of this inspection, Ohio EPA observed the roll-off box of pea coal (D008) was not labeled with an accumulation date.

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Upon being informed of this violation, ASW immediately labeled the container with an accumulation date. Ohio EPA therefore considers this violation abated and no further action is required.

Ohio EPA has the following comment:

1. ASW generates a waste pea coal which is characteristically hazardous for lead (D008). At the time of this inspection, Ohio EPA observed several areas of spilled pea coal around the roll-off box. ASW stated that they would take a photograph of the spilled pea-coal and address this mismanagement of hazardous waste in the annual Hazardous Waste training to be given the following day.

Ohio EPA wishes to remind ASW that the mismanagement of this waste stream has been very costly for them in the past, in consultant fees and penalties. They would do well to make sure their employees are properly trained to clean up any pea-coal spilled in the course of its transfer to the roll-off box.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link: http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve ASW from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve ASW 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:cl

ec: Natalie Oryshkewych, DHWM, NEDO, OEPA
Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA
Donna Kniss, DSW, NEDO, OEPA

cc: Marlene Kinney, DHWM, NEDO, OEPA

Send to Central Office



Ohio Environmental Protection Agency

For Ohio EPA use only

RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORMCompleted verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.

EPA ID Number: **OHD042708586**

Site Name

Name: **American Spring Wire**

Website:

(Optional)

Site Location Information

Street Address: **26300**City, Town, or Village: **Bedford Hts**State: **OH**County Name: **Cuyahoga**

Zip Code:

Site Land Type

(check only one)

NAICS code(s)

www.census.gov/epcd/www/naics.html

Private



County



District



Federal



Indian



Municipal



State



Other

**331222**

Facility Representative

First Name: **Richard**MI: **A**Last Name: **Buda**

Additional names can be recorded in number 12

Title: **Environmental Health & Safety**Phone Number: **216-292-4620**Phone Number Extension: **263**

Only provide address information if it is different than the site address

E-Mail Address: **rbuda@amspringwire.com**Fax Number: **216-292-4790**

Fax Number Extension:

Street or P.O. Box:

City, Town or Village:

State:

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:

American Spring Wire

Date Became Owner

(mm/dd/yyyy):

Owner Type:

Private



County



District



Federal



Indian



Municipal



State



Other

Street or P.O. Box: **same**

City, Town or Village:

Owner Phone #:

State:

Country:

Zip Code:

Name of Site's Operator:

American Spring Wire

Date Became Operator

(mm/dd/yyyy):

Operator Type:

Private



County



District



Federal



Indian



Municipal



State



Other

Street or P.O. Box: **same**

City, Town or Village:

Operator Phone #:

State:

Country:

Zip Code:

VIOLATIONS CITED?

 Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

 Not a HW Generator UNKNOWN:

Cited for violation of 3745-52-11

 Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. Large Quantity Generator (LQG) Small Quantity Generator (SQG) Conditionally Exempt Small Quantity Generator U.S. Importer of Hazardous Waste Mixed Waste (Hazardous and Radioactive) Generator

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

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Underground Injection Control Facility
	<input type="checkbox"/> Receives Hazardous Waste from Off-site

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

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> 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 or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAinfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001	D002	D005	D007	D008	K062
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COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC

Announced: Yes No Address at Facility: Representatives:

Tanks: Yes No

Containers: Yes No

Name of Inspector(s) Suzanne Prusnek	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm) 05/05/2010 2:00pm
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Comments: