



State of Ohio Environmental Protection Agency

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Ted Strickland, Governor  
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August 21, 2008

Ron Bunofsky  
Environmental, Health and Safety Manager  
Astro-Coatings, Inc.  
27 Main St.  
Struthers, OH 44471-1942

**RE: ASTRO-COATINGS INC., OHR000104067, MAHONING COUNTY**

Dear Mr. Bunofsky:

On July 18, 2008, I received Astro-Coatings, Inc. (Astro-Coatings') response to Ohio EPA's June 19, 2008, Partial Return to Compliance (PRTC) letter. To summarize, Astro-Coatings has abated violations numbered 3, 4, 5, 6, 7.B, 8, 9, 10, 11 and 12 as appearing in the June 19 PRTC letter.

The following is the status of the previously cited, unabated violations:

1. ORC §3734.02(F), Causing Hazardous Waste to be Transported to an Unpermitted Facility:

To demonstrate efforts towards abating this violation, Astro-Coatings' May 15, May 28 and June 13, 2008 responses included information concerning paint line waste management activities and process changes. Please refer to these responses for full details.

It is Ohio EPA's understanding that Astro-Coatings has ceased using the Billet Yard dock for the accumulation of hazardous waste. As required by OAC rule 3745-52-34(A)(1)(e) and in accordance with OAC rules 3745-66-11 and 3745-66-14, Astro-Coatings must conduct closure activities for the area where the roll-off box containing paint line wastes was located. Astro-Coatings' July 18 response included a preliminary plan to decontaminate these surfaces. Ohio EPA requests the following details concerning the proposed steps to adequately decontaminate the surfaces:

- The type of surfactant to be used in conjunction with water.
- Identify the specific decontamination steps to be used. For example, the facility may choose to first remove all gross contamination followed by a triple wash/rinse step.
- Identify how the area will be prepared to capture all wash/rinse solutions.
- Identify when decontamination activities will be implemented.

For additional information concerning decontamination efforts, please refer to Section 3.10 of Ohio EPA's Closure Plan Review Guidance for RCRA Facilities, available at <http://www.epa.state.oh.us/dhwm/cprg.html>.

2. OAC rule 3745-52-11, Waste Evaluation: Astro-Coatings' July 18 response included a copy of the corresponding manifest documenting the lawful, off-site disposal of the two, 55-gallon drums of D007 hazardous waste. Based on submitted documentation, this violation has been adequately abated. No further information is requested.
  
- 7.A. OAC rule 3745-66-73, Management of Containers: Astro-Coatings' July 18 response included photographs documenting that the F019 roll-off box was covered (closed). Based on submitted documentation, this violation as been adequately abated. No further information is requested.

Astro-Coatings July 18 response included documentation concerning Ohio EPA's June 19 request for information. With respect to this information, please identify when the facility began using the reclaimed xylene solvent that was characterized as D006/D007/D008/D035/F003/F005 hazardous waste. Additionally, please identify how the facility currently characterizes the waste solvent generated from paint line cleanup or purging activities.

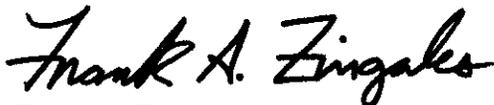
Please submit a response concerning the above within 14 days of receipt of this letter.

Astro-Coatings' July 18 response also contained a number of assertions that require correction. Your response stated "...it is our understanding that Astro Coatings has fully complied with your request and the matter is resolved. It is further our understanding that with the process changes and other actions taken by Astro Coatings, it is proper for Astro Coatings to treat the paint line waste as non-hazardous and dispose of it at Carbon Limestone Landfill or other such facility." Please be advised that the act of returning to compliance does not necessarily resolve this enforcement matter. Further be advised that it is Astro-Coatings' on-going responsibility to characterize its waste stream; Ohio EPA is not in a position to determine whether your waste stream will perpetually remain non-hazardous, and Ohio EPA does not endorse one legal disposal method over any other legal method.

Please be aware that present or past instances of non-compliance may continue as subjects of pending or future enforcement actions. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Astro-Coatings 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  
Kelly Smith, DHWM, CO  
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Richard D. Panza - Wickens, Herzer, Panza, Cook & Batista