



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

November 7, 2007

RE: ASTRO SHAPES, CEI - LQG
OHD 154 165 591, MAHONING COUNTY
TANK ASSESSMENT

Ron Bunofsky
Astro Shapes
65 Main St.
Struthers, OH 44471

CERTIFIED MAIL

Dear Mr. Bunofsky:

On August 1, 2007, Ohio EPA, Northeast District Office received Astro Shapes' assessment for its hazardous waste tank. Ohio EPA, Central Office, has reviewed the assessment and identified the following deficiencies. To address the deficiencies, Astro Shapes must submit the requested information within 30-days of the date of this letter:

OAC rule 3745-66-93: Secondary Containment Requirements

- 1) Secondary containment for the tank consists of an external concrete liner. Total containment capacity is not calculated in the assessment. Ohio EPA calculates a containment capacity of approximately 6,000 gallons based on the dimensions provided, but is unable to accurately consider the displacement of other objects within the secondary containment given the available information. Astro Shapes must revise the assessment to provide a detailed calculation of containment system volume and show that the requirements of OAC rule 3745-66-93 (E) to contain 100% of the largest tank volume in the containment boundary are met.
- 2) The assessment provides no information on whether chemically resistant water stops are in place at all joints (for the joints between concrete slabs). (OAC 3745-66-93 (D)(1)(e))
- 3) The written assessment does not include an elevation/side view of the tank system sufficiently detailed to determine whether the containment area is appropriately sloped or otherwise designed to drain and remove liquids resulting from leaks or spills. OAC 3745-66-93(C)(4).

Failure to list specific deficiencies in this communication does not relieve Astro Shapes from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,

Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

cc: John Nyers, DHWM, CO
ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO
Harry Sarvis, DHWM, CO