



State of Ohio Environmental Protection Agency

Northeast District Office

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

July 17, 2007

**RE: BESCOAST, INC.
LAKE COUNTY
OHD 004 198 958
LQG CEI NOTICE OF VIOLATION**

Mr. Norm Hirter
Bescast, Inc.
4600 E 355th Street
Willoughby, Ohio 44094

Dear Mr. Hirter :

On July 2, 2007, Ohio EPA received a letter with attachments dated June 29, 2007, from Bescast, Inc. This letter was in response to Ohio EPA's May 22, 2007 Notice of Violation letter (NOV). The response included the following:

- Attachment #2 - Uncontrolled copy of a weekly inspection log
- Attachment #3A, B & C - Photographs of the lines painted on the floor of the accumulation area allowing for aisle space
- Attachment #7 - Photograph of fluorescent lamps that are closed, labeled and in good condition
- Attachment # 8 - Close up of Universal Waste lamp label showing the boxes have accumulation date
- Attachment #9 - Close up of Universal Waste lamp labels showing the boxes have accumulation date
- Attachment #10A - E-mail regarding the management of accidentally broken lamps
- Attachment #10B - Photograph of the recycling lamp kit
- Attachment #10C - Close up photograph of the recycling lamp kit showing the container is labeled and has an accumulation date
- Attachment #10D - Information of recycling lamp kit
- Attachment #11A - Universal Waste Battery training log
- Attachment #11B - Universal Waste Lamp training log
- Attachment #12 - Photograph of used oil release clean up
- Attachment #13 - Copy of the manifest #000553589 FLE documenting six totes were shipped off-site
- Attachment #13 - LDR for manifest #000553589 FLE
- Attachment #13 - Statement that Bescast intends to request a "high vacuum" tanker truck
- Attachment #14 - Copy of manifest #000881253/4 and 6 FLE documenting miscellaneous unused material were shipped off site
- Attachment #14 - LDR for manifest #000881253/4 and 6 FLE

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Attachment # 15 -	Photograph of sealed pipe in secondary containment
Attachment #16 -	Work Order for the removal of debris from secondary containment
Attachment #17 -	Waste Management Special Waste Approval and waste analysis of blasting waste
Attachment #18A & B -	Photographs of universal waste battery container
Attachment #19 -	Clean Harbors re-certification changing the waste from F002 to F001
Attachment #21-	Name of the vendor who purchases Bescast's dross and slag (Miles Alloy)

As stated in the May 2007 NOV, no further action was required for the following violations:

4. ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A)(2)***

Based on the information provided, it appears that Bescast has adequately addressed the following violations from the May 2007 NOV:

2. ***Testing and Maintenance of Equipment, OAC rule 3745-65-33***
3. ***Required Aisle Space, OAC rule 3745-65-35***
7. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1)***
8. ***Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E)***
9. ***Accumulation time limits – standards for small quantity handlers of universal waste, OAC rule 3745-273-15(C)***
10. ***Management of Broken or Damaged Universal Waste Lamps, OAC rule 3745-273-13(D)(2)***
11. ***Employee Training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16***
12. ***Used Oil Storage Requirements for Generators, OAC 3745-279-22(D)***

You state in your letter that additional time is needed to address the following violations:

1. ***Waste Evaluation, OAC rule 3745-52-11***
5. ***Personnel Training, OAC rule 3745-65-16***
6. ***Content of the Contingency Plan, OAC rule 3745-65-52***

Please submit the documentation addressing violations 1,5 and 6 as noted above by August 15, 2007.

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In addition, Ohio EPA noted concerns numbered 13 through 19 and 21. There was no response to concern #20. Please review and respond:

20. During the inspection, it was discussed that if Bescast was a large quantity generator, the former accumulation area would need to meet the closure performance standard found in OAC rule 2745-66-11.

Ohio EPA has discovered that a significant amount of waste was shipped from the facility in 1987, 8.1 tons. While this is an average of approximately 600 kilograms per month, if generated all at once, it may trigger the closure obligation. Therefore, Ohio EPA requests you try and determine if the rate of waste generation was a regular amount on consistent basis, batch generations, annual clean out, etc. Please let me know if this can be determined.

Please submit the requested documentation by August 15, 2007. Should you have any questions, please feel free to call me or my supervisor, Frank Popotnik at this office.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cl

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO