



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Konecki, Director

November 29, 2010

Duke Allyn, President
Chardon Metal Products, Co.
206 Fifth Ave.
Chardon, OH 44024

**RE: CHARDON METAL PRODUCTS, CO., OHD004184503, GEAUGA CO.
SQG>CESQG, NOV/PRTC**

Dear Mr. Allyn:

Thank you for your letter dated November 8, 2010, which was received November 9, 2010. Your letter was in response to my October 7, 2010 notice of violation letter.

You have adequately addressed the following violations:

1. Waste Determination - OAC 3745-52-11
We understand you plan to recycle used fluorescent lamps as universal wastes in the future.
2. Used Oil Container Condition - OAC 3745-279-22(B)
The contents of the badly dented used oil drum were transferred to a plastic tote.

The following violations remain unabated:

1. Waste Determination - OAC 3745-52-11
The used oil/wastewater/coolant mixture has not been evaluated in accordance with OAC 3745-52-11 to determine if it is hazardous. Your response indicated you are looking into who can perform an analysis for you. You will remain in violation of this rule until you provide a written waste determination for this waste stream.
2. Used Oil Container Label - OAC 3745-279-22(C)
All containers holding used oil must be clearly labeled or marked with the words "used oil". Your response stated used oil containers will be labeled "used oil" and that a photo documenting this was included. However, the photo was not received. Please confirm with a photo that used oil containers are now properly labeled.

CHARDON METAL PRODUCTS, CO.
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Spillage Concern:

In response to our concern regarding oil spillage, you described new equipment and procedures that will be used to eliminate the spillage. *Please also indicate what measures you have taken to clean up the spillage in this area.*

Please address the above two unabated violations and concern immediately and submit the requested documentation and responses within 15 days of the date of this letter. The rules cited and related information can be found on our division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions related to this letter, please feel free to call me at (330) 963-1226.

Sincerely,



Sheryl K. Slone, P.E.
Environmental Engineer
Division of Hazardous Waste Management

SKS:ddw

ec: Natalie Oryshkewych, DHWM, NEDO
Nyall McKenna, DHWM, NEDO
Harry Sarvis, DHWM, CO

<p>The absence of a specific deficiency or violation in this letter does not relieve your facility from the obligation to comply with all applicable regulations.</p>
