



**Environmental
Protection Agency**

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

CERTIFIED MAIL

November 3, 2010

Mr. Robert Patton
Clamco Corporation
Plaza Drive
Parma, OH 44130

**RE: CLAMCO CORPORATION, OHD 986 980 175, CUYAHOGA COUNTY,
COMPLIANCE EVALUATION INSPECTION, CONDITIONAL EXEMPT SMALL
QUANTITY GENERATOR, SECOND NOTICE OF VIOLATION**

Dear Mr. Patton:

On August 11, 2010, I conducted a hazardous waste compliance evaluation inspection (CEI) of Clamco Packaging Corporation (Clamco) in Parma. The purpose of the inspection was to determine Clamco's compliance with Ohio's hazardous waste laws and regulations found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). A Notice of Violation (NOV) letter was sent to you on September 14, 2010, specifying the violations observed during the inspection as well as concerns to be addressed. An e-mail was sent to you on October 18, 2010, inquiring into your progress and offering assistance. To date, Ohio EPA has not received a response from you and Clamco **remains in violation of the following Ohio hazardous waste rules.**

VIOLATIONS

- 1 - 3. **OAC rule 3745-52-11. Hazardous waste determination.** "Any person who generates a waste.... must determine if that waste is a hazardous waste"
4. **OAC rule 3745-279-22 (C)(1). Used oil container labeling.** "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words, "Used Oil".

CONCERN

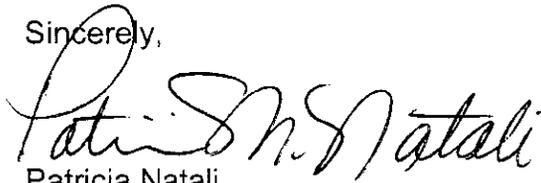
During the inspection, I observed various chemicals in a chemical storage room. You indicated Clamco may relocate and many of the chemicals in the storage area will not be needed. Prior to discarding the unwanted chemicals, Clamco must make a hazardous waste determination. If the unwanted chemicals are hazardous waste, they must be managed as such.

CLAMCO CORPORATION
NOVEMBER 3, 2010
PAGE - 2 -

In order to return to compliance with Ohio's hazardous waste rules as found in Chapter 3745. of the Ohio Administrative Code, Clamco **must provide the information requested in my September 14, 2010 NOV within 15 days of the date of this second NOV or we will be forced to escalate enforcement.**

If you are in need of further assistance, you may call me at (330) 963-1279.

Sincerely,



Patricia Natali
Environmental Specialist
Division of Hazardous Waste Management

PN:ddw

cc: Marlene Kinney, DHWM, NEDO
ec: Natalie Oryshkewych, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO

NOTICE:

Failure to list specific deficiencies or violations in this communication does not relieve Clamco 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.