

**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

January 11, 2011

Mr. Robert Patton  
Clamco Corporation  
775 Berea Industrial Parkway  
Berea, OH 44017

**RE: CLAMCO CORPORATION, OHD 986 980 175, CUYAHOGA COUNTY, CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR, COMPLIANCE EVALUATION INSPECTION, NOV/RETURN TO COMPLIANCE**

Dear Mr. Patton:

Thank you for your December 31, 2010 response to Ohio EPA's September 14, and November 3, 2010 Notice of Violation (NOV) letters. In an e-mail dated December 31, 2010, you described several events that occurred in September and October contributing to the lateness of your response. One of the events included the company's move from the Parma location to the Berea location. Violations cited were based on observations made during a compliance evaluation inspection (CEI) conducted on August 11, 2010 at the 12900 Plaza Drive, Parma, OH location.

The documentation you submitted included:

- Material data safety sheets (MSDSs) for lacquer thinner used as parts cleaner and for Hurrissafe S910, a biodegradable aqueous cleaner/degreaser to replace the lacquer thinner;
- An interoffice memo (IOM) instructing employees to use Hurrissafe S910 instead of the lacquer thinner;
- An IOM to employees regarding fluorescent lamps and ballasts management;
- Correspondence with Fluorescent Recycling for the recycling of fluorescent bulbs; and
- Photographic documentation showing your container of used oil with a "Used Oil" label.

My review of the documentation submitted reveals you have **returned to compliance** with all of the rules cited.

1. **OAC Rule 3745-52-11, Waste Evaluation.** Based on the information provided regarding Clamco's evaluation of spent fluorescent bulbs and ballasts, **this violation is considered abated.** You also included a description of Clamco's procedures for managing spent fluorescent bulbs and ballasts and the name of the company that will be recycling the spent materials.
2. **OAC Rule 3745-52-11, Waste Evaluation.** Based on the information provided regarding Clamco's evaluation of their paint waste and paint booth filters, **this violation is considered abated.** In addition, you do not have a paint booth at the Berea location and so, will not generate a paint booth filter waste stream.

MR. ROBERT PATTON  
CLAMCO CORPORATION  
JANUARY 11, 2011  
PAGE - 2 -

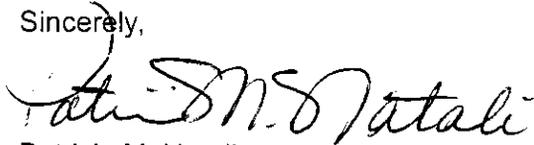
3. **OAC Rule 3745-52-11, Waste Evaluation.** Based on the information provided regarding Clamco's evaluation of their parts cleaner, **this violation is considered abated.** You stated in your December 31, 2010 correspondence that Clamco no longer uses lacquer thinner to clean parts and so the evaporation of this waste stream is no longer an issue.
4. **OAC Rule 3745-279-22(C)(1), Used oil labeling.** You submitted a photograph showing you have added "Used Oil" labels to your used oil container. **This violation has been abated.**

#### Comments

During the inspection of Clamco Corporation in Parma, various containers of chemicals were observed in a storage area. In your December 31, 2010 correspondence, you stated that Clean Harbors was contracted to inventory the chemicals that were not transferred to the Berea location. You also mentioned that arrangements are being made for all of the materials to be taken off-site for proper disposal. You offered to send a copy of the manifest upon completion of disposal. This is not necessary; however, it is good management practice to maintain records of waste management documents for three years.

At this time, all violations have been abated and Clamco has returned to compliance. Should you have any questions, please feel free to contact me at (330) 963-1279.

Sincerely,



Patricia M. Natali  
Environmental Specialist  
Division of Hazardous Waste Management

PMN:ddw

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

**NOTICE:** Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.