



State of Ohio Environmental Protection Agency

**Northeast District Office**

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

April 9, 2007

**RE: CLEVELAND COMMUTATOR CO.  
OHD 004 198 453  
SMALL QUANTITY GENERATOR (SQG)**

Joseph Supina  
Cleveland Commutator Co.  
4865 West 130<sup>th</sup> St.  
Cleveland, Ohio 44135-5182

Dear Mr. Supina:

I have received your March 9, 2007 letter and your March 27, 2007 email. These document the corrections of all the violations and concerns found during my January 29, 2007 inspection of Cleveland Commutator Co. (CCC) located at 4865 West 130<sup>th</sup> Street, Cleveland, Ohio. This documentation is outlined below.

**Small Quantity Generator Requirements**

1. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.  
Your letter documented the correction of this violation.
2. OAC rule 3745-52-34(D)(4) – Accumulation start dates.  
Previously corrected. Your letter documents actions which should prevent this violation in the future.
3. OAC rule 3745-66-74 – Inspections of container storage areas.  
Your letter documented the correction of this violation.

**Universal Waste Handler Requirements**

4. OAC 3745-273-14 (E) - Universal waste lamp labeling.  
Your letter documented the correction of this violation.

**Concerns**

1. CCC generates two materials from dust collection units. You have submitted photos and a description that documents the waste in this area has been cleaned up.
2. You have determined that your waste plating solution has a pH of less than 2.
3. OAC rule 3745-52-42(B) – Manifest exception report.  
You are now tracking the return of the manifests.
4. OAC rule 3745-65-33 – Testing and maintenance of equipment.  
You provided a copy of a completed inspection log.

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5. Since the inspection you have determined that your waste plating solution does not exceed the TCLP limit for chromium. You have submitted an updated land disposal notification for this waste stream.
6. Universal waste, including burned out fluorescent lamps.  
You shipped this universal waste on March 8, 2007. I suggest you mark your future containers of this universal waste with the date the first waste lamp is put into it. Please note that OAC rule 3745-273-15(C) requires that a company be able to demonstrate the length of time that a universal waste has been accumulated.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land, and water. They can be contacted at (800) 329-7518, or <http://www.epa.state.oh.us/ocapp/ocapp.html>. In June 2006 they published a 56 page Small Business Environmental Compliance Self-Assessment Guide which can be found at: <http://www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf>.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,

  
Robert Almquist  
Division of Hazardous Waste Management

RA:cl  
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO  
ec: Frank Popotnik, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Ken Slepecky, Cleveland Commutator Co.

<p>Notice: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.</p>
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