



**Environmental
Protection Agency**

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

July 22, 2010

RE: COMMERCIAL ANODIZING
OHD 004 209 409

Mark Swetel
Commercial Anodizing
38387 Apollo Parkway
Willoughby, OH 44094

Dear Mr. Swetel:

Thank you for your letter dated April 30, 2010. That letter was in response to my letters which dealt with my December 2, 2009 inspection of Commercial Anodizing located at 38387 Apollo Parkway, Willoughby, Ohio. As outlined below, you have documented a correction of some of the violations but not all of the violations.

1. Ohio Revised Code (ORC) 3734.02(E) and (F) – Accumulation beyond 180 days.
You provided me with a copy of a manifest showing the May 10, 2010 shipment of 2 yards of F006 hazardous waste to Envirite of Ohio in Canton, Ohio.
2. OAC rule 3745-52-34(D)(5)(c) – Employees familiar with waste handling and emergency procedures.
The training logs you sent me dated May 6, 2010 and May 27, 2010 document your correction of this violation.
3. OAC rule 3745-65-31 – Maintenance and operation of facility.
Previously corrected.
4. OAC rule 3745-65-33 – Testing and maintenance of equipment.
Your April 30, 2010 letter documents a correction of this.
5. OAC 3745-52-34(C)(1)(a) – Satellite accumulation area.
Previously corrected.
6. OAC 3745-52-34(C)(1)(b) – Satellite accumulation area.
7. OAC rule 3745-52-34(D)(4) – Hazardous waste labels.
8. OAC rule 3745-52-34(D)(4) – Accumulation start dates.
Your April 30, 2010 letter documents the correction of these three violations.
9. OAC rule 3745-66-74 – Inspections of container storage areas.
This rule requires that the owner or operator must inspect areas where containers of hazardous waste are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The owner or operator must also record inspections in an inspection log or summary. An example log is enclosed and can be found at: [SQG Container Inspection Log - OAC Rule 3745-66-74](http://epa.ohio.gov/portals/32/pdf/sqglog.PDF)
<http://epa.ohio.gov/portals/32/pdf/sqglog.PDF>

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Your April 30, 2010 letter states these inspections will be done monthly. During any months that you generate over 220 pounds of hazardous waste these inspections need to be done at least weekly. Please either start the required inspection program and log or send me documentation, such as a waste generation log, showing that you did not generate over this amount during the past few months. If you did generate over this amount then please send me a copy of a completed inspection log.

1. OAC rule 3745-52-11 – Hazardous waste determination.
This violation dealt with three containers that were stored outside and soil contamination at one of the containers. Your April 30, 2010 letter gave an update regarding this. We also had email correspondence regarding this on May 19, 2010. Please send me a description of how you have corrected this violation.

A written response to the remaining violations is required within 30 days.

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

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

Sincerely,



Robert Almquist
Division of Hazardous Waste Management

RA:ddw

ec: Frank Popotnik, DHWM, NEDO
Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Suzanne Prusnek, DHWM, NEDO

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.