



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

December 4, 2007

RE: COMPONENT REPAIR TECH.
LARGE QUANTITY GENERATOR
OHD 147 190 417
LAKE COUNTY
PRTC

Mr. Cliff Smith
Component Repair Technologies
8507 Tyler Boulevard
Mentor, OH 44060

Dear Mr. Smith:

On November 15, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, received Component Repair Technologies' (CRT) response to the Agency's October 15, 2007 notice of violation (NOV) letter.

The Ohio EPA has completed a review of the submitted documentation and a response to each violation is presented below (Violations 2 and 11 remain outstanding).

1. Unpermitted Storage, ORC §3734.02 (E) and (F):
The facility submitted two hazardous waste manifests documenting the three containers of hazardous waste were sent off-site for disposal.

CRT submitted the requested documentation and no further response to this violation is required at this time.

2. Personnel Training, OAC rule 3745-65-16 (D)(1-3):
The facility submitted hazardous waste job titles, job descriptions and training information for 16 employees.

This violation remains outstanding. In order to abate this violation, CRT must submit an updated training table. The table should be revised to indicate that Cliff Smith will receive annual training on the facility contingency plan; and include the emergency coordinators (Andrew LaTourette, Terry Kotal, and Jennifer Weinbrecht). In addition, please submit documentation which indicates the emergency coordinators have received training on hazardous waste management procedures and contingency plan implementation. Please submit this information within 15 days of your receipt of this letter.

3. Contingency Plan, OAC rule 3745-65-52 (D):
The facility submitted a list of emergency coordinators along with their contact information.

CRT has adequately demonstrated abatement of this violation and no further response is required.

4. Required Equipment, OAC rule 3745-65-32(B) and 3745-65-34(A):
The facility stated a telephone will be installed at the central hazardous waste storage area.

In order to abate this violation, please submit a photograph demonstrating the telephone has been installed.

5. Testing and Maintenance of Equipment, OAC rule 3745-65-33:
The facility submitted a copy of a completed weekly inspection form documenting emergency equipment is being inspected.

CRT has adequately demonstrated abatement of this violation and no further response is required.

9. Open Container, OAC rule 3745-66-73(A):
The facility closed the hazardous waste container and completed annual hazardous waste training on October 8, 2007.

CRT has adequately demonstrated abatement of this violation and no further response is required.

10. Inspections, OAC rule 3745-66-74:
The facility submitted a copy of a completed weekly inspection form documenting that hazardous waste containers are being inspected.

CRT has adequately demonstrated abatement of this violation and no further response is required.

11. Tank System, OAC rules 3745-66-91 through 100:
The facility stated it plans to install new piping and tanks for both the Cleaning and Plating line. CRT anticipates the new equipment to be installed and certified by April 15, 2008.

CRT remains in violation of OAC rules 3745-66-91 through 100. In order to abate this violation, the facility must submit a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with OAC rule 3745-66-92. The assessment should include all newly installed ancillary equipment, the two new hazardous waste tanks, and secondary containment for all hazardous waste tanks.

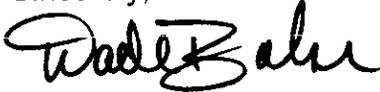
COMPONENT REPAIR TECH.
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Concerns:

15. CRT submitted the requested documentation.
16. CRT submitted the requested documentation.

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any question, please feel free to call me at (330) 963-1278. You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Wade Balsler
District Representative
Division of Hazardous Waste Management

WB:ddw

ec: 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 all applicable regulations.