



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

June 12, 2007

RE: CONTINENTAL PRODUCTS  
CEI - LQG  
OHD 004 181 764  
CUYAHOGA COUNTY  
NOTICE OF VIOLATION

John Stevens  
Continental Products Corporation  
1150 E. 222<sup>nd</sup> Street  
Euclid, OH 44117

Dear Mr. Stevens:

On May 30, 2007, Ron Shadrach and I inspected Continental Products Corporation for compliance with Ohio's hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC)

You represented Continental Products Corporation during the inspection. Continental Products Corporation manufactures specialty paints and coatings.

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations of Ohio's hazardous waste regulations. In order to correct them you must do the following and send me all requested information **within 30 days** of the date of this letter:

**1. Management of Containers  
OAC 3745-66-73(A)**

*A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.*

There was one container in the drying area and one in the QC lab that were not closed per this rule. This was abated on June 5, 2007, when you e-mailed pictures showing the containers had been properly closed.

**2. Labeling of Containers (Satellite Accumulation)  
OAC 3745-52-34 (C)(1)(b)**

A generator may accumulate...hazardous wastes...at or near any point of generation where wastes initially accumulate, which is under control of the operator of the process generating the wastes...provided he...marks his containers either with the words 'Hazardous Waste' or with other words that identify the contents of the containers

The satellite containers in the drying area and in the QC Lab were not labeled per this rule. This violation was abated on June 5, 2007, when you submitted copies of photographs showing that the containers had been properly labeled.

**3. Labeling/Marking Standards for Universal Waste (Lamps)  
OAC 3745-273-14(E)**

*Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)"*

A box of universal waste lamps was not labeled per this rule. This violation was abated on June 5, 2007, when you submitted a photograph showing that the box has been labeled.

**4. Content of Contingency Plan– Emergency Equipment  
OAC 3734 65-52 (E)**

*The contingency plan must also include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment, where this equipment is required. In addition, the contingency plan shall include the location and a physical description of each item on the list and a brief outline of its capabilities. The list must be kept up to date.*

Continental Products' contingency plan does not include a list of emergency equipment. To abate this violation, you must include a list of emergency equipment in your contingency plan that includes all of the requirements of this rule. You must submit a copy to this office.

**5. Emergency Equipment Inspections  
OAC 3545-65-33**

*All communication and emergency equipment shall be inspected as necessary to assure proper operation in time of emergency*

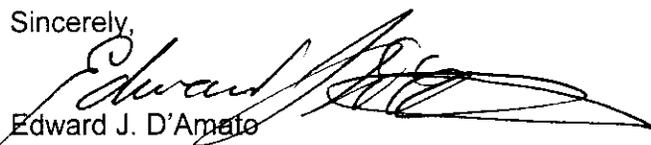
You are not conducting emergency equipment inspections per this rule. To abate this violation, you must begin conducting emergency equipment inspections. You must notify this office of what the inspection interval will be, and you must send a copy of the inspection log or summary to this office that shows one actual inspection has been completed.

Enclosed is a copy of the checklist used for the inspection.

Failure to list specific deficiencies in this communication does not relieve Continental Products Corporation 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.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,

  
Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

Enclosure

cc: Natalie Oryshkewich, DHWM, NEDO  
ec: Frank Popotnik, DHWM, NEDO  
Ron Shadrach, DHWM, NEDO  
Harry Sarvis, DHWM, CO