



State of Ohio Environmental Protection Agency

Northeast District Office

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June 25, 2007

John Cestarc
Engineering Manager
Coretec Cleveland, Inc.
7 Ascot Pkwy.
Cuyahoga Falls, OH 44223

RE: CORETEC CLEVELAND, INC., OHR000029793, SUMMIT COUNTY, RTC

Dear Mr. Cestarc:

On May 10 and 18, 2007, I received Coretec Cleveland, Inc. (Coretec's) response (dated May 9 and 17, 2007) to Ohio EPA's April 9, 2007 letter. Subsequently, on June 21, 2007, I received Coretec's response (dated June 19, 2007) to Ohio EPA's June 5, 2007 email. The following is the status of the previously cited, unabated violations:

1. OAC rule 3745-52-11, Waste Evaluation:
 - A. Coretec's response indicated that the facility will manage the waste stream consisting of spent rags as a flammable (ignitable) hazardous waste. Please ensure that all satellite containers of rags are labeled as to their contents. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
 - B. Coretec's response indicated that the facility will manage the waste stream consisting of dust from machining operations as a D008 (lead) hazardous waste. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
2. OAC rule 3745-52-20(A), Manifest Requirements: Coretec's response included information concerning the correction of the affected manifests. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
4. Personnel Training, OAC rule 3745-65-16(A)(1-3), (B), (C), & (D)(1-4): Coretec's responses included documentation concerning the training topics provided to each employee, sign-in sheets documenting the dates when training was provided to each employee; and personnel training records required by OAC rule 3745-65-16(D)(1-4). **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**

5. OAC rule 3745-65-52(A)(C)(D)&(E), Content of Contingency Plan: Coretec's responses included a contingency plan that met the requirements of OAC rule 3745-65-52. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
6. OAC rule 3745-65-53(B), Copies of Contingency Plan: Coretec's responses included documentation that the contingency plan was distributed to emergency authorities as required by OAC rule 3745-65-53(B). **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
7. OAC rule 3745-66-73(A), Management of Containers: Coretec's response included photographs which showed the spent etchant and spent flux drums were closed. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
9. OAC rule 3745-270-07(A)(2), LDR Requirements:
 - A. OAC rule 3745-270-07(A)(2): Coretec's response included copies of the land disposal restriction (LDR) notification forms for the spent flux and waste corrosive liquids. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
 - B. OAC rule 3745-270-07(A)(2): Coretec's response included the LDR notification form for the spent etchant transported to Heritage Micronutrients. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
10. OAC rule 3745-273-13(D)(1), Universal Waste Management Standards for Small Quantity Handlers: Coretec's response included a photograph which showed the universal waste lamps being accumulated in an adequate container. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**
11. OAC rule 3745-273-14(E); Labeling/marketing Standards for Small Quantity Handlers of Universal Waste: Coretec's response included a photograph which showed that the container of lamps was labeled as "waste lamps." **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**

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12. OAC Rule 3745-273-15(C); Accumulation Time Limits - Standards For Small Quantity Handlers of Universal Waste: Coretec's response included a procedure for tracking the amount of time universal waste lamps are accumulated on-site. Additionally, Coretec initiated a shipment of universal waste lamps on April 17, 2007. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**

13. OAC rule 3745-273-16, Employee Training for Small Quantity Handlers of Universal Waste: Coretec's response included documentation concerning the training provided to employees involved with universal waste management. **Based upon submitted documentation, this violation has been adequately abated. No further response is required.**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Coretec from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

cc: Natalie Oryshkewych, DHWM, NEDO