

**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

September 20, 2011

**RE: REIGHART STEEL PRODUCTS
OHD 986985554
NOTICE OF VIOLATION**

Douglas Reighart
Reighart Steel Products
37877 Elm St.
Willoughby, OH 44094

Dear Mr. Reighart:

On September 14, 2011, I inspected 37877 Elm Street in Willoughby, Ohio. The purpose of this was to determine if this location was in compliance with Ohio's hazardous waste and used oil laws and rules as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

You explained that your previous tenant, Correct Air, has moved out and that the building is now mostly empty but that you now rent some of the space to a computer business. The following document is enclosed which explains the rules regarding waste computers:

Management of Electronic Waste from Businesses, 2004
http://epa.ohio.gov/portals/32/pdf/Electronic_Equipment_Guidance.pdf

The following violation was found: (These follow the order of the enclosed checklist.)

1. OAC Rule 3745-273-13 (D)(1) - Universal waste lamp containers.

This rule requires universal waste lamps to be in closed containers or packages that are structurally sound and adequate to prevent breakage. I gave you the following document which explains these rules:

Ohio's Universal Waste Rules: Are You Handling Used Lamps Correctly?, 2010
<http://www.epa.ohio.gov/portals/41/sb/publications/Lampcompliancechecklist.pdf>

Reighart Steel Products violated this rule by having two waste fluorescent lamps that were not in a closed container or package. **Please contact me when you have corrected this.**

We saw a few pallets of material that were left by your former tenant, Correct Air Corp. These materials included latex paint and a grey, plastic container of unknown material. You said you are not sure if you will use any of this material. **Please send me a list of what materials are there and indicate your planned use, if any, for the material.**

For anything that is determined to be a waste you must determine if it is a hazardous waste. I am available to help you make that determination. The following places may be able to help you find someone that can use some of this material.

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Ohio By-Product Synergy Network

<http://www.ohiobps.org/>

Ohio Materials Exchange

<http://www.myomex.com/ViewPosting.aspx?cat=3>

g2 Revolution

<http://www.g2rev.com/>

Zerowaste NEO

<http://www.zerowasteneo.org/>

<http://www.recyclematch.com/>

<http://cleveland.craigslist.org/>

(under the for sale section is a listing for free items)

<http://www.throwplace.com/>

I gave you a list of waste disposal and recycling companies in Northeast Ohio. You may want to contact one or more of these companies to give you a quote for the disposal of anything that will not be used.

Other information and suggestions:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues (including sources of funding) related to air, land, and water. They can be contacted at: (800) 329-7518, or <http://www.epa.ohio.gov/Default.aspx?alias=www.epa.ohio.gov/ocapp>.
- Entrepreneurs for Sustainability is a group that seeks to "build a sustainable regional economy in Northeast Ohio that will create prosperity and total community health." They offer workshops, conferences, a business to business directory and more. Their website is at <http://www.e4s.org/content/index.asp>.
- ENERGY STAR is a government-backed program helping businesses and individuals protect the environment through superior energy efficiency. Their website is at: <http://www.energystar.gov/>.
- The Clean Air Resource Center offers help in understanding EPA air quality requirements. In addition, if your business is required to purchase new equipment, they can offer better-cost financing with special tax incentives. Their phone number is (800) 225-5051 and website is <http://www.ohioairquality.org/>.
- Ohio Bureau of Workers' Compensation has an OSHA On-Site Consultation service which includes free on-site safety inspections and consultation, safety program assistance, and safety and hygiene training or seminars. More information can be found at: <http://www.ohiobwc.com/employer/programs/safety/SandHOSHAOnSite.asp>.

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If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us. I look forward to your prompt response addressing any remaining issues.

Sincerely,



Robert Almquist
Division of Materials and Waste Management

RA:cl
Enclosures

ec: Frank Popotnik, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Jeff Mayhugh, DMWM, CO

cc: Marlene Kinney, DMWM, 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.

Send to Central Office

Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD986985554	
Site Name	Name: Reighart Steel Products	Website: (Optional)
Site Location Information	Street Address: 37877 Elm St.	
	City, Town, or Village: Willoughby	State: OH
	County Name: Lake	Zip Code: 44094
Site Land Type (check only one)	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
NAICS code(s) www.census.gov/epcd/www/naics.html		
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Douglas	MI: Last Name: Reighart
	Title: President	
	Phone Number: 440-946-2100	Phone Number Extension: 101
	E-Mail Address: dougr@stickercorp.com	
	Fax Number: 440-946-2163	Fax Number Extension:
	Street or P.O. Box: same	
	City, Town or Village:	
	State:	Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Reighart Steel Products	
	Date Became Owner (mm/dd/yyyy): 01/01/1961	
	Owner Type:	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other
	Street or P.O. Box: same as location	
	City, Town or Village:	
	Owner Phone #:	
	State:	Country: Zip Code:
	Name of Site's Operator: same	
	Date Became Operator (mm/dd/yyyy):	
	Operator Type:	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other
Street or P.O. Box:		
City, Town or Village:		
Operator Phone #:		
State:	Country Zip Code:	

VIOLATIONS CITED? Yes No**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAinfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

- | | | | |
|------------|------------------------------|--|--------------------------------------|
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |
| Containers | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |

Name of Inspector(s)
Robert Almquist

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
09/14/2011

Comments: