



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 16, 2009

Robert Spaans
Composite Technologies of America
1331 S. Chillicothe Rd.
Aurora, OH 44202-9218

RE: CTOA, OHD 052 322 989, PORTAGE COUNTY, RETURN TO COMPLIANCE

Dear Mr. Spaans:

Thank you for your June 5, 2009 response to Ohio EPA's May 4, 2009 Notice of Violation (NOV). The documentation you submitted included the following:

1. An outline of the hazardous waste training given to CTOA personnel.
2. A copy of the weekly container inspection form showing two (2) completed weekly inspections.
3. A copy of an emergency equipment inspection log showing one (1) completed inspection.
4. A copy of the 2007 Annual hazardous waste report for the facility. No hazardous waste was generated by the facility between October 2006 and December 2006
5. A copy of a Land Disposal Restriction Form for its waste resin and resin sludge waste streams.
6. A list of job titles and descriptions which CTOA included in the facility contingency plan.
7. A list of individual training records for employees who were given hazardous waste training. The list was received via e-mail on June 11, 2009

Ohio EPA has reviewed the documentation and determined that it is sufficient to abate the following violations listed in the NOV:

1. **Personnel Training**
OAC 3745-65-16(A)(1), (A)(2) and 16(C)
2. **Personnel Training Requirements**
OAC 3745-65-16(D)(2) and (D)(3)

3. **General Inspection Requirements**
OAC 3735-66-74(A) and (B)
4. **Emergency Equipment Inspections**
OAC 3545-65-33
5. **Required Equipment (Communication Device)**
OAC 3745-65-32(B)
6. **Land Disposal Restriction Form**
OAC 3745-270-07(A)(2)
8. **Annual Report (Retention)**
OAC 3745-52-40(B)

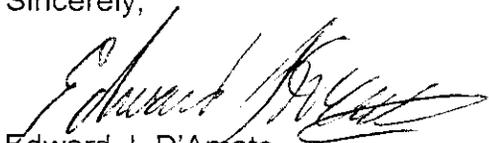
Please note that based upon our telephone conversation of May 13, 2009 regarding CTOA's procedure for managing satellite containers, the following violation is **rescinded**:

7. **Accumulation Time of Hazardous Waste (Satellite Exemption)**
OAC 3745-52-34 (C)(1)

Failure to list specific deficiencies in this communication does not relieve CTOA 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

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO