



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 20, 2007

**RE: DIE CO., INC.
CONDITIONALLY EXEMPT SMALL
QUANTITY GENERATOR
OHD 004 522 967
LAKE COUNTY
NOTICE OF VIOLATION**

Mr. Dave Coffee
Die Co., Inc.
1889 E. 337th Street
Eastlake, Ohio 44095

Dear Mr. Coffee:

Thank you for accompanying me during Ohio EPA's June 5, 2007 inspection of Die Co., Inc.'s (Die Co.) facility in Eastlake, Ohio. I inspected Die Co. to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). During the inspection we also identified ways you have prevented pollution by reducing waste.

I found the following violations of Ohio's hazardous waste laws.

**1. Universal Waste Closed Container
[OAC 3745-273-13(D)(1)]**

In Building 3 there were open boxes of used lamps and long used lamps sticking out of a short lamp box. The universal waste lamps must be contained in containers or packages that are structurally sound, and adequate to prevent breakage. Please place the used lamps in the appropriate sized boxes. Please document that all lamps are in the appropriate sized box by submitting a photo or written confirmation.

Containers and packages containing used lamps must be closed. Please document that all boxes of used lamps are closed by submitting a photo or written confirmation that all used lamp containers are properly closed. Also confirm that the employee(s) responsible for managing waste lamps have been instructed on proper management.

**2. Label Unit Holding Universal Waste Lamp
[OAC 3745-273-14(E)]**

In Building 3 there were unlabeled boxes of waste lamps. The boxes containing the lamps must be labeled, "Universal Waste Lamps." Please document that all boxes of used lamps are labeled appropriately by submitting a photo or written confirmation that all used lamp boxes are labeled.

3. **Small Quantity Handlers must Label Universal Waste Batteries/Containers [OAC 3745-273-14(A)]**

In Building 3 there were unlabeled waste batteries. Please document that all batteries or containers of batteries are labeled, "Universal Waste Batteries," by submitting a photo or written confirmation that all waste batteries are labeled appropriately.

4. **Small Quantity Handlers must have Demonstration for Length of Accumulation [OAC 3745-273-15(C)]**

Die Co. could not provide information to document the length of accumulation of the waste batteries at the time of the inspection. Paperwork for recycling the batteries or "turning them in" could not be provided. Please document that all waste batteries are accumulated no longer than one year. Please provide any paperwork that may have been found to document when the waste batteries were recycled, or turned in, or traded in.

5. **Used Oil Containers and Tanks Must Be Labeled with the Words Used Oil [OAC 3745-279-22(C)(1)]**

In Building 1 you identified two totes in the storage area as containing waste oil. These totes were not labeled, "Used Oil." We located waste manifests from PennOhio that listed the waste as "used oil." Please document that all used oil containers are labeled, "Used Oil," by submitting a photo or written confirmation that all used oil containers are labeled appropriately.

General Comments

As we discussed during the inspection, Die Co. has implemented pollution prevention by eliminating chromium use, and recycling paper, cardboard, scrap metal, used oil, florescent lamps, batteries. Die Co. also launders their shop rags. Finding ways to recycle, reduce or eliminate the amount of waste that your company generates, you are able to reduce treatment and disposal costs as well as regulatory requirements.

The Ohio Department of Development' s Office of Energy Efficiency may be able to help with energy efficiency issues. Their web site is at: <http://www.odod.state.oh.us/cdd/oeef/>.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact me at (330) 963-1214. Ohio EPA has helpful information about this at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp/>.

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Enclosed you will find a copy of the checklists that we completed as a result of the inspection as well as an email outlining several guidances. Should you have any questions, please feel free to call me at (330) 963-1214. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl
Enclosures

cc: Natalie Oryshkewych, DHWM, NEDO

ec: Frank Popotnik, 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.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). **If so, complete the Small Quantity Generator Requirements checklist.**

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
- b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No N/A
- c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
- d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

[Facility Name/Inspection Date]

[ID number]

CESQG/February 2007

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