



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 31, 2007

Mr. Bruce Richardson  
Manager, Environmental  
Argo-Tech Corporation  
23555 Euclid Ave.  
Cleveland, OH 44117

**RE: ARGO-TECH CORPORATION, OHD157367301, LARGE QUANTITY  
GENERATOR, CUYAHOGA COUNTY, NOTICE OF VIOLATION/RETURN TO  
COMPLIANCE LETTER**

Dear Mr. Richardson:

On May 17 and 22, 2007, the Ohio Environmental Protection Agency (EPA), Division of Hazardous Waste Management (DHWM), conducted a compliance evaluation inspection at Argo-Tech Corporation (ATC), located at 23555 Euclid Avenue, Cleveland, Ohio. The purpose of the inspection was to determine ATC's 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). ATC was represented by you, and Ohio EPA was represented by me. This letter will explain the violations found and discuss what you need to do to correct the violations.

ATC manufactures aerospace fuel pumps for commercial and military airplanes. Hazardous waste generated by ATC includes F006 plating sludge, lab pack waste, waste aviation fuel filters, chrome and lead debris masking materials generated during plating operations, and various spent solvent cleaning agents such as methyl ethyl ketone, isopropyl alcohol, petroleum distillate cleaner, and acetone. Aviation fuel which is generated from fuel cell testing is not a hazardous waste. It is an off-specification chemical product and is transported off-site as a fuel. Other waste streams include used oil, batteries and fluorescent light bulbs.

I have enclosed copies of the inspection checklists for your records. During the inspection, I found the following violations of Ohio's hazardous waste laws:

- 1. OAC 3745-273-13(D)(1); Standards for universal waste lamps, failure to store lamps in a closed container.**

Lamps being stored next to the hazardous waste accumulation area, located in building 3, Bay -13, were being stored in boxes that were not closed, in violation of this rule.

**This violation was abated on May 22, 2007, when I observed that all the boxes had been taped shut. No further action is required by ATC regarding this violation.**

- 2. OAC 3745-273-14(E); Standards for universal waste lamps, failure to label used lamp containers.**

A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in this rule. The container or package in which lamps are contained must be labeled or clearly marked with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

ATC failed to label/mark containers of universal waste lamps located next to the hazardous waste accumulation area with the words required by this rule.

**This violation was abated on May 22, 2007, when I observed that all the boxes had been properly labeled. No further action is required by ATC regarding this violation.**

- 3. OAC 3745-273-16; Standards for universal waste, failure to train employees who handle universal waste.**

Employees who handle or have the responsibility for managing universal waste must be informed of waste handling/emergency procedures relative to their responsibilities. This training would include a discussion of how universal waste lamps must be in a closed and labeled container while being accumulated on-site.

On May 21, 2007, ATC provided training to those persons who are directly responsible for handling universal waste. I reviewed the training outline and the sign in sheets to verify that the employees had attended training.

**This violation was abated on May 21, 2007. No further action is required by ATC regarding this violation.**

- 4. OAC 3745-273-14(A); Standards for universal waste batteries, failure to properly label a used battery.**

A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in this rule. Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

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I noted seven (7) batteries in the hazardous waste accumulation room that had not been labeled with the words as required by this rule. You placed a label on each battery while we were in the hazardous waste accumulation room.

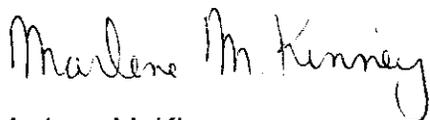
**This violation was abated on May 17, 2007. No further action is required by ATC regarding this violation.**

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

Should you have any questions, please feel free to call me at (330) 963-1162. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

The Division of Hazardous Waste Management has created an electronic news service to provide the regulated community with news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service by going to <http://www.epa.state.oh.us/dhwm/listserv>.

Sincerely,



Marlene M. Kinney  
Environmental Specialist  
Division of Hazardous Waste Management

MMK:ddw

Enclosures

cc Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO