



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 24, 2008

RE: ELECTRO PLATING AND FABRICATING
CUYAHOGA COUNTY
RCRA/LQG
COMPLIANCE EVALUATION INSPECTION
RETURN TO COMPLIANCE

Don Paukert
General Manager
4008 East 89th Street
Cleveland, Ohio 44105

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Paukert:

Thank you for your response to Ohio EPA's June 17, 2008 Notice of Violation (NOV) letter. Electro Plating and Fabricating (EP&F) submitted information and documentation including the following submittals.

By letter received at this office on July 08, 2008:

- Copies of two consecutive weeks of completed hazardous waste tank system inspection log sheets.
- Eight (8) photographs demonstrating that Universal Waste (UW) lamps generated by the facility are being managed in containers that are closed, labeled, and dated in order to track how long the lamps have been on site.
- A draft copy of the facility Universal Waste Protocol.
- A copy of the facility Broken Lamp Protocol.
- Copies of job titles and descriptions for the two positions that manage hazardous waste at the facility.
- A list of employees which fill the positions that manage hazardous waste at the facility.
- A draft copy of the facility hazardous waste contingency plan.

By letter dated August 7, 2008, Ohio EPA received:

- A revised copy of the facility hazardous waste contingency plan, including documentation demonstrating that it has been sent to the required emergency authorities.
- A copy of the facility hazardous waste personnel training program including sign-in sheets documenting the employees have been trained,
- Copies of training certifications for Eric Coker and Chris Demand demonstrating that they had been formally trained in hazardous waste management.

- Copies of the facility UW protocol and broken lamp protocol, including sign-in sheets demonstrating the necessary employees have been trained in UW management at the facility.
- Land Disposal Restriction (LDR) forms for hazardous waste streams sent to Envirote and Vickery, which have been amended to include the manifest number of the shipment.
- A copy of EP&F's annual hazardous waste report for 2007.

My review of this documentation reveals that EP&F has adequately demonstrated abatement of the following hazardous waste violations cited in Ohio EPA's June 17, 2008 NOV letter and is hereby returned to compliance.

OAC 3745-66-95 Tank Inspections

OAC 3745-273-13(D)(1) Universal Waste Lamp Management

OAC 3745-273-14(E) Labeling/marketing of Universal Waste

OAC 3745-273-15(C) Accumulation time limits for Universal Waste

OAC 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste

OAC 3745-65-52 (D) Content of contingency plan

OAC 3745-65-52 (E) Content of contingency plan

OAC 3745-65-53(B) Copies of contingency plan

OAC 3745-65-54(D)(E) Amendment of contingency plan

OAC 3745-65-16 Personnel training

OAC 3745-65-16(D) Personnel training

OAC 3745-52-41(A) Annual Reports

OAC Rule 3745-270-07(A) Testing, Tracking, and Record keeping Requirements for Generators, Treaters, and Disposal Facilities

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (*i.e.* source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their web site is: <http://www.epa.state.oh.us/opp/ocapp.html>

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The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link:

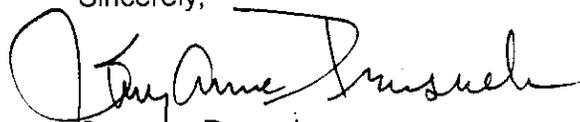
<http://www.epa.state.oh.us/dhwm/listserv.html>

Please feel free to share this information with your colleagues.

Failure to list specific deficiencies in this communication does not relieve EP&F from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve EP&F from liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA

cc: Natalie Oryshkewych, DHWM, NEDO, OEPA