



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 17, 2008

Eric Manuel
Elyria Plating Corporation
118 Olive Street
Elyria, OH 44035

**RE: *ELYRIA PLATING CORPORATION, LORAIN COUNTY, OHD004210035,
RCRA/LQG, COMPLIANCE EVALUATION INSPECTION, PARTIAL RETURN TO COMPLIANCE***

Dear Mr. Manuel:

Thank you for your September 24, 2008 response to Ohio EPA's August 26, 2008 Partial Return to Compliance (PRTC) letter. Elyria Plating Corporation (EPC) submitted information and documentation including:

- Two (2) color photographs demonstrating that the totes being used to accumulate hazardous waste have been labeled with an accumulation date.
- A copy of the analytical data and Chain of Custody (COC) demonstrating that the used oil spill cleaned up around the cadmium plating line has been cleaned up, characterized and properly managed.
- A statement and copy of the Project Contract demonstrating that EPC has contracted with Compliance Technologies to perform the hazardous waste training program, which will be performed in October 2008.
- A copy of hazardous manifest #001592241 FLE demonstrating that the WWTU sludge is now being manifested as an F006 waste and not F019.

By letter dated July 08, 2008, Ohio EPA received the following documentation:

- A copy of job titles and descriptions for positions which manage hazardous waste and a list of employees which fill those positions.

My review of this documentation reveals that EPC has adequately demonstrated abatement of the following violations cited in Ohio EPA's May 14, 2008 NOV letter:

OAC 3745-52-34(A)(2) Accumulation date

OAC Rule 279-22(D) Response to releases of used oil

OAC 3745-65-16(D) Job titles and descriptions

EPC remains in violation of the following hazardous waste violation until this office receives adequate documentation demonstrating abatement of said violation:

1. **OAC 3745-65-16(A)(B)(C) Personnel training:**

At the time of this inspection, EPC did not have a personnel training program for employees involved with hazardous waste management at the facility as required by Ohio hazardous waste regulations.

By letter received at this office on September 24, 2008, EPC submitted documentation indicating the facility has arranged for hazardous waste training for employees to take place in October of 2008. Ohio EPA wishes to remind the facility that this training must be documented and must include training on the facility contingency plan.

Please submit all of the requested documentation to my attention within thirty (30) days of receipt of this letter demonstrating that all issues have been addressed.

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>

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 EPC from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve EPC 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