



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

February 22, 2007

Norbert B. Boyk  
Environmental Health & Safety Director  
ESCO Turbine Technologies  
34000 Lakeland Blvd.  
Eastlake, OH 44095

**RE: ESCO TURBINE TECHNOLOGIES, OHD098912934, LAKE COUNTY, RTC**

Dear Mr. Boyk:

On February 20, 2007, I received ESCO Turbine Technologies (ESCO's) response (dated February 13, 2007) to Ohio EPA's January 29, 2007 letter. On February 20 and 21, 2007, I received ESCO's facsimiles concerning the facility's 2004 and 2005 Annual Hazardous Waste Reports. The following is the status of the previously cited, unabated violations:

1. ORC §37434.02(E)&(F), Unlawful Storage of Hazardous Waste: ESCO provided instruction to all affected employees on the proper evaluation, management and disposal of hazardous waste. This instruction was included as part of the facility's personnel training program. **No further information is requested to address this violation.**
3. OAC rule 3745-52-41(A)(5), Annual Report: On February 20 and 21, 2007, ESCO submitted amended pages concerning the facility's 2004 and 2005 Annual Hazardous Waste Reports. **Based upon submitted documentation, ESCO has adequately abated this violation. No further information is requested.**
5. Personnel Training, OAC rule 3745-65-16(A)(1-3), (B), (C), & (D)(1-4): ESCO's February 13, 2007 response included documentation to address the following requirements of this rule:
  - A. OAC rules 3745-65-16(A)(1-3),
  - B. OAC rule 3745-65-16(B),
  - C. OAC rule 3745-65-16(C), and
  - D. OAC rules 3745-65-16(D)(1-4).

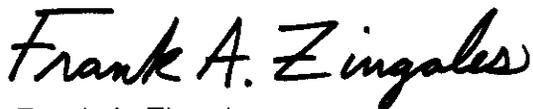
**Based upon submitted documentation, ESCO has adequately abated this violation. No further information is requested.**

8. OAC rule 3745-65-52(D)&(E), Content of Contingency Plan:
  - B. OAC rule 3745-65-52(E): ESCO's February 13, 2007 response included a revised contingency plan which specified the location of emergency equipment. **Based upon submitted documentation, ESCO has adequately abated this violation. No further information is requested.**
9. OAC rule 3745-65-53(B), Copies of Contingency Plan: ESCO's February 13, 2007 response included documentation that the plan was distributed to emergency authorities. **Based upon submitted documentation, ESCO has adequately abated this violation. No further information is requested.**
11. OAC rule 3745-270-07(A)(2)&(7), LDR Requirements:
  - A.1. OAC rule 3745-270-07(A)(2): ESCO's February 13, 2007 response included a copy of the LDR notification form for the spent Hydrochloric acid. **Based upon submitted documentation, ESCO has adequately abated this violation. No further information is requested.**
12. OAC rule 3745-52-11, Waste Evaluation
13. OAC rule 3745-52-20, Manifest Requirements
14. OAC rule 3745-52-31 & OAC rule 3745-52-32, Labeling and Marking Requirements
15. OAC rule 3745-270-07, LDR Requirements

ESCO provided instruction to all affected employees on the proper evaluation, management and disposal of hazardous waste. This instruction was included as part of the facility's personnel training program. **No further information is requested to abate violation 12 through 15.**

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales  
Environmental Specialist  
Division of Hazardous Waste Management

FAZ:ddw

cc: Natalie Oryshkewych, NEDO, DHWM  
Todd Anderson, CO, Legal  
Jim Kavalec, CO, DHWM