



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 5, 2010

**RE: MT HEAT TREAT, INC.
OHD 004 171 781
LAKE COUNTY
NOTICE OF VIOLATION**

Mr. O.V. Mathews
MT Heat Treat, Inc.
8665 Station Street
Mentor, Ohio 44060

Dear Mr. Mathews:

Thank you for accompanying Sherry Slone and me during Ohio EPA's January 13, 2010 inspection of the MT Heat Treat, Inc. (MT) facility in Mentor, Ohio. Bob Vores, Kirk Wagner, and Sonja Blank also represented the facility during the inspection. We inspected MT Heat Treat to determine its compliance with Ohio's hazardous waste and used oil laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Our inspection included a review of facility operations and written documentation. During the inspection we also helped you identify ways to prevent pollution by reducing waste.

MT uses batch furnaces to harden and anneal such metal items as bolts, bushings, and car parts. A limited amount of blasting is performed on steel items using glass and metal shot. Two quench oils are used in the facility and recycled.

During the inspection we explained that the address of the facility was assigned an Ohio Hazardous Waste Generator number which still appears with the name "Lintern". You will need to contact Kristina Durnell at (614) 644-1694 to request that she assign the OHD number to MT Heat Treat.

We found the following violation of Ohio's hazardous waste laws.

Violation

1. **Used Oil Containers Labeled:** OAC 3745-279-22(A) Used oil containers were not labeled with the words "Used Oil".

We observed used oil in barrels and totes. These containers were labeled by MT to represent oil for recycling. Ohio EPA also requires that containers with used oil in them be labeled specifically, "used oil". Please label the used oil containers with the words "used oil" and submit photos that document this to me.

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General Comments

1. During the inspection, we noted baghouse dust from blasting operations. We asked if the used blasting dust may be hazardous. On January 20, 2010, MT Heat Treat sent documentation of generator knowledge that the dust would not be a hazardous waste based on the process.
2. Although there were no spent lamps accumulating at the time of the inspection, you were uncertain how you would manage and dispose of spent lamps when they are eventually generated. When you do generate these wastes you will need to make a hazardous waste evaluation or manage them as universal wastes. We explained that often these wastes would be hazardous waste so it might be easier to manage them under the universal waste rules without analyzing them. We provided you with a guidance document on this topic. Additional information can be found at <http://www.epa.ohio.gov/dhwm/fluorescent.aspx> and a list of recyclers can be found at: <http://epawebapps.epa.state.oh.us/Recyclers/jsp/results.jsp?category=33>.
3. Please respond in writing with what your plan will be for the management of these wastes when they are generated.

Please submit the above requested documentation within 30 days of the date of this letter. A copy of the checklists completed for this inspection is enclosed. You can find a copy of the cited rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements.

MT Heat Treat may be able to reduce the waste your company generates through recycling. If you find ways to recycle, reduce or altogether eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs. And, you may possibly reduce your regulatory requirements. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

If you would like to be considered for an in depth on-site confidential compliance assistance and/or pollution prevention assessment, or if you would like more information, please contact Adrienne LaFavre at (330) 963-1250.

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The Division of Hazardous Waste Management has created an electronic news service to provide you with updates on events and news related to hazardous waste activities in Ohio. You can find more information at <http://web.epa.state.oh.us/dhwm/listserv.html>.

Should you have any questions, please feel free to call me at (330) 963-1214.

Sincerely,


Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl
Enclosures

ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Sherry Slone, DHWM, NEDO

cc: Marlene Kinney, 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.