



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 23, 2009

Mr. Randy Parker, Director EHS  
Shiloh Industries, Inc.  
880 Steel Drive  
Valley City, OH 44280

and

Mr. Ed Waddles  
Modern Tool & Die  
5965 Grafton Road  
Valley City, OH 44280

Dear Mr. Parker and Mr. Waddles:

**RE: SHILOH INDUSTRIES, OHD 059 053 263, CUYAHOGA COUNTY, CRO,  
HAZARDOUS WASTE AND GENERATOR CLOSURE RTC**

Based on the information provided in your February 10, 2009 email and other information and observations made during a walkthrough inspection on February 13, 2009 it appears that you have abated all cited hazardous waste violations and met closure requirements that appear to apply to Shiloh Industries, Inc. The hazardous waste violations include the following:

1. OAC 3745-273-14(E) Universal Waste Lamps
2. OAC 3745-273-15(C) Accumulation time
3. OAC 3745-273-13 (D)(1) Lamps must be contained and containers closed
4. OAC 3745-273-13(D)(2) Broken Lamps
5. OAC 3745-279-22(D) Detection of release of used oil

### GENERATOR CLOSURE

The information received via email on February 10, 2009, also included documentation of closure. Various sampling confirmation data and other hazardous waste management documentation appears to indicate that these storage areas were not affected by hazardous waste activities at the site. Shiloh Industries, Inc. appears to have completed generator closure of the following two inside areas at 5389 W. 130th Street in Parma identified as:

1. Location I "Shipping and Receiving"; and
2. A "Warehouse" area.

These areas are identified on an attached site map which was provided by Shiloh Industries, Inc. The site map shows the location of these areas and the approximate location of sample borings.

Based on review of the information provided it appears that the above identified areas of hazardous waste activity meet Ohio EPA's closure performance standards according to OAC 3745-52-34(A)(1). In addition, it appears that the CRO requirements have been completed. A CRO inspection checklist is attached.

Failure to list specific deficiencies in this communication does not relieve Shiloh Industries, Inc. or MTD Products from the responsibility of complying with all applicable laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions, please feel free to contact me at (330) 963-1146 or at [ron.shadrach@epa.state.oh.us](mailto:ron.shadrach@epa.state.oh.us).

Sincerely,



Ronald J. Shadrach  
Division of Hazardous Waste Management

RJS:ddw

Enclosure

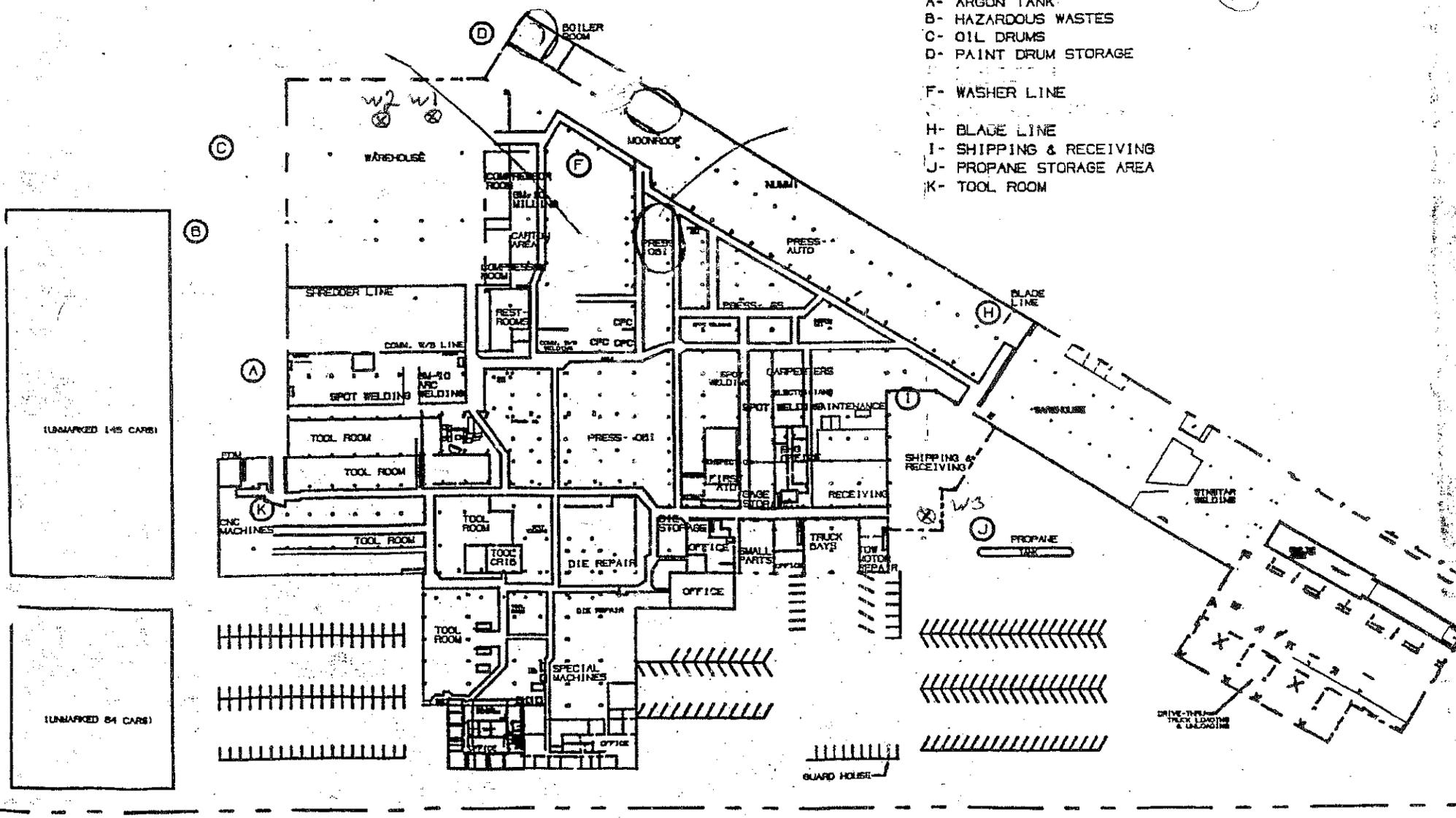
ec: Frank Popotnik, DHWM, NEDO  
Mitch Mathews, DHWM, CO  
Sherry Slone, DHWM, NEDO  
John Palmer, DHWM, NEDO  
cc: Ralph McGinnis, DHWM, CO  
Tom O'Donnell, Calfee, Halter & Griswold

# CHEMICAL STORAGE LOCATIONS



Rec'd 2/13/2009  
 from R. Parker  
 Skitch Industries  
 (RS)

- A- ARGON TANK
- B- HAZARDOUS WASTES
- C- OIL DRUMS
- D- PAINT DRUM STORAGE
- F- WASHER LINE
- H- BLADE LINE
- J- SHIPPING & RECEIVING
- J- PROPANE STORAGE AREA
- K- TOOL ROOM



3/1/04