



State of Ohio Environmental Protection Agency

Northeast District Office

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

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

January 14, 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  
RETURN TO COMPLIANCE, HAZARDOUS WASTE VIOLATIONS  
CLOSURE PERFORMANCE REQUIREMENTS***

On September 11, 2008, the Ohio EPA received a request for an extension to complete the CRO requirements and documentation that identified a new facility contact. Then on December 1, 2008, a CRO 90-day submittal was received with some supporting documentation of that effort. On December 12, 2008, a site visit inspection was conducted. That inspection identified that ongoing facility renovation, modification or remediation efforts continue to generate wastes, hazardous wastes or regulated substances. In addition, there are at least two Shiloh hazardous waste generator units, whose closure remains to be confirmed. Based on discussions during my site visit, facility representatives understand that wastes generated from closure activities, remediation renovation and demolition will require management and disposal according to all pertinent RCRA regulations. It appears that the CRO requirements have been completed and that ongoing activities and generation of wastes and regulated substances are non-CRO related.

Based on the information provided for CRO and the apparent status at the time of the inspection it appears that you have abated the following violations:

1. Designation of a contact person, ORC 3752.05(C) and OAC 3745-352-35(D)
2. Extension request, ORC 3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)
3. SERC Form, ORC 3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)
4. Current hazardous chemical list, ORC 3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)
5. Drain or remove all regulated substances, ORC 3752.06(A)(4) & OAC rule 3745-352-20(A)(2)(c)
6. List of vessels contaminated, ORC 3752.06(A)(3) & OAC rule 3745-352-20(A)(2)(d)
7. Remove all debris, equipment, containers, ORC 3752.06(A)(5) & OAC rule 3745-352-20(A)(2)(c)
8. Warning signs maintained, OAC rule 3745-352-30(C)

9. Waste Evaluation OAC 3745-52-11
10. Used Oil Storage Requirements for Generators (Labels), OAC 3745-279-22(C)
11. Response to Releases of Used Oil, OAC 3745-279-22(D).

However, Shiloh and MTD will continue to be responsible for identifying the items that are a concern for solid and hazardous waste units, underground storage areas and areas of known or suspected contaminant release. They will be responsible for removing all debris, equipment, containers, contaminants and regulated substances from such areas according to Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC). This will include the segregation and disposal of wood block flooring from contaminated soil in the building.

Soil being treated for contamination with volatile organic chemicals was observed partially covering areas of wood block floor that was loose and in poor condition. The wood block floor was previously characterized as a hazardous waste by the toxicity characteristic leaching procedure for lead. During the site visit it was observed and acknowledged that soil piles had encroached over at least one area of wood block flooring that was loose and in poor condition. The wood block hazardous waste debris must be segregated from the soil which is being treated for unrelated constituents.

To avoid further violations of illegal treatment and disposal under the hazardous waste rules you must ensure this material is segregated and properly disposed. Please submit a uniform hazardous waste manifest for the disposal of wood block floor debris accumulated onsite.

## **VIOLATIONS**

The following violations need to be abated by providing the response requested below:

1. **Universal Waste Lamps, OAC 3745-273-14(E):** You failed to label about one dozen spent lamps with the words "Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)" that you indicated were to be recycled.

Please provide a photo that shows spent universal waste lamps are now labeled per the rule.

2. **OAC 3745-273-15(C) Accumulation time:** You failed to date or otherwise track the accumulation time of universal waste lamps.

Please provide a photo that shows spent universal waste lamp containers are dated and thus the accumulation time is now being tracked.

3. **OAC 3745-273-13 (D)(1) Lamps must be contained and containers must remain closed:** You failed to contain about 12 spent eight foot fluorescent lamps that you indicated would be sent for recycling. Several of these lamps had become broken.

Please provide a photo that shows you are now properly managing spent universal waste lamps in a closed container.

- 4. OAC 3745-273-13(D)(2) Broken Lamps:** You failed to immediately contain releases and residues of universal waste lamps that had become broken.

Please provide documentation that the broken lamp debris has been cleaned up and contained and provide receipt or shipping documentation that all the above universal waste has been recycled.

- 5. OAC 3745-279-22(D) Detection of release of used oil:** Outside, on the ground at the south end of the facility hill press area, were scrap metal pieces and the asphalt paved surface that were oily stained. This surface area was exposed to storm water runoff and the environment.

Please provide photo documentation that shows this oily scrap has been removed and the oil residue cleaned with a dri-sorb type material or otherwise, to eliminate the residue from outside pavement and storm run-off. Based on recent oil sources used at your facility it appears that oil stained sweepings, scrapings and oily dri-sorb material may be disposed as a solid waste.

## **GENERATOR CLOSURE**

### **Hazardous Waste Generator Unit Concern**

**The units discussed here apply generally to Shiloh operations as the Ohio EPA understands it. The Ohio EPA is considering MTD's remediation effort and closure requirements as a separate matter.**

This facility was at one time a large quantity generator of hazardous waste during operations by Shiloh Industries and Modern Tool & Die. The facility is therefore subject to closure/cleanup requirements for all areas where hazardous waste was accumulated, released or potentially released and must comply with OAC rules 3745-66-10 to 3745-66-20, and 3745-66-97.

Shiloh identified that during their operations hazardous waste was accumulated at the site in two areas. These areas were pointed out in an initial walkthrough. Subsequently, inspection logs were provided whose descriptive location could not be confirmed or matched by Shiloh or MTD personnel during a December 12, 2008 inspection meeting. Should Shiloh not be able to confirm the location of the "North and South Yard Areas" identified in the inspection logs; additional generator efforts may be required. The two generator areas Shiloh identified in the initial walkthrough are:

1. An indoor area also identified in a March 2004 site map as, Location I "Shipping and Receiving";
2. An indoor location in the eastern central "Warehouse" as identified on a March 2004 site map. This location was identified as an area where at least D001 waste sodium and nitrate salts were staged.

Due to the lack of complete records, additional measures of closure were conducted at the generator unit area of item #1 above (“Shipping and Receiving” area). However, these measures did not address volatile constituents. Volatile constituents are a known contaminant at the site and were managed by Shiloh Industries. Ohio EPA has not received satisfactory historic documentation that meets the closure performance requirement for volatile constituents in this area.

One boring placed through the broken concrete of the “Shipping and Receiving” generator storage area (Item #1 above) may be adequate to characterize this area. A sample from 0 to 2 feet below the base of the concrete may be adequate to characterize soil below this generator area. The number and location of samples taken need to meet the criteria established in DHWM closure guidance (<http://www.epa.state.oh.us/dhwm/cprg.html>).

For the “Warehouse” generator storage area (Item #2 above), Ohio EPA requires that this area be closed (in a manner equivalent to that needed to satisfy the “Shipping and Receiving” area of Item #1) due to the lack of any records for this area. Storm drains and lines in this area are the likely receptor or sources from a container release in the “Warehouse” generator area. Samples should be collected within close proximity of these lines from this generator storage area. The number and location of samples taken need to meet the criteria established in DHWM closure guidance (<http://www.epa.state.oh.us/dhwm/cprg.html>). The borings should extend to depths below the invert of the storm lines. That is, depths greater than four feet may be indicated as storm drains are the most likely source in this warehouse area. The concrete surfaces, where unobstructed, appear in good condition but this matter needs to be confirmed.

Although a sampling plan is not being requested at this time, it is expected that when executed, Shiloh/MTD will follow all customary protocol for QA/QC as identified below and submit that documentation in a report. DHWM protocols include the following:

1. Areas of fine grain material should be sampled using an *EnCore*® or equivalent type sampler. For volatile organic analysis of soils, Methods 5035 or 5021 are recommended. Additional information is located at: [http://www.epa.state.oh.us/dhwm/new\\_methods.html](http://www.epa.state.oh.us/dhwm/new_methods.html).
2. Subsurface sampling investigation protocol should conform to Ohio EPA performance standards and the current ASTM Standard D 5730-04 to demonstrate the soils meet the performance standards of OAC 3745-66-11.
3. Sampling methods and equipment, as well as laboratory analytical methods, must follow guidance in USEPA's SW-846, “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Third Edition.”
4. Samples will be analyzed using EPA Method 8260B (volatiles).
5. Provide DHWM a copy of the analytical data and corresponding QA/QC lab documentation.

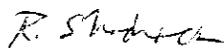
As it is understood from Mr. Waddles, MTD wants to transfer a clean site to a prospective buyer. It appears that Shiloh can best meet this goal and that of the closure performance standard through sampling and submittal of the above documentation for the generator storage areas.

Other hazardous waste accumulation or potential release areas that have been or are yet to be identified are understood to be the responsibility of MTD Products. MTD appears engaged in correcting several of these matters. However, the nature and extent of all closure and release areas has not been disclosed. Without pertinent analytical results, sampling plans, procedures or detailed protocol efforts, the Ohio EPA cannot validate any of the work conducted.

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.

This letter requests that documentation to substantiate generator closure of two indoor storage units be provided. Please **submit the requested documentation to my attention within 30 days** of receipt of this letter. 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

ec: Frank Popotnik, DHWM, NEDO  
Mitch Mathews, DHWM, CO  
Sherry Slone, DHWM, NEDO  
John Palmer, DHWM, NEDO  
cc: Ralph McGinnis, DHWM, CO

**CESSATION OF REGULATED OPERATIONS CHECKLIST**

|   |  |                             |  |                          |  |
|---|--|-----------------------------|--|--------------------------|--|
| <input checked="" type="checkbox"/>   | <b>Permanent Cessation</b>   | <input type="checkbox"/>    | <b>Temporary Discontinuation</b>             | <input type="checkbox"/> | <b>Requesting Waiver for Temporary Discontinuation</b> |
| <b>COMPANY:</b>   |  |                             |  |                          |  |
| <b>Name:</b>  | Shiloh Industries, Inc. – Randy Parker   |                             |  | <b>EPA ID#:</b>          | OHD 059 053 263  |
| <b>Street:</b>  | 5389 W. 130 <sup>th</sup> Street   |                             |  | <b>City:</b>             | Parma  |
| <b>County:</b>  | Cuyahoga   | <b>State:</b>               | Ohio   | <b>Zip:</b>              | 44130  |
| <b>Telephone Number:</b>  | 419-631-2282   |                             | <b>Fax Number:</b>                           |                          |  |
| <b>OWNER/OPERATOR:</b>  |  |                             |  |                          |  |
| <b>Name:</b>  | Shiloh Industries, Inc.  |                             |  |                          |  |
| <b>Street:</b>  | 880 Steel Drive  |                             |  | <b>City:</b>             | Valley City  |
| <b>County:</b>  | Medina   | <b>State:</b>               | Ohio   | <b>Zip:</b>              | 44280  |
| <b>Telephone Number:</b>  |  |                             | <b>Fax Number:</b>                           |                          |  |
| <b>CONTACT PERSON OR PRINCIPLE OFFICE INFORMATION</b>                               |  |                             |  |                          |  |
| <b>Name:</b>  | Randy Parker   |                             |  |                          |  |
| <b>Street:</b>  |  |                             |  | <b>City:</b>             |  |
| <b>County:</b>  |  | <b>State:</b>               |  | <b>Zip:</b>              |  |
| <b>Telephone Number:</b>  | 330-558-2621   |                             | <b>Fax Number:</b>                           |                          |  |
| <b>If the following applies, check the appropriate box and provide information:</b> |  |                             |  |                          |  |
| <input type="checkbox"/>  | <b>Holder of First Mortgage</b>  | <input type="checkbox"/>    | <b>Fiduciary</b>                             | <input type="checkbox"/> | <b>Receiver</b>  |
| <input type="checkbox"/>  |  |                             |  |                          | <b>Indentured Trustee</b>                              |
| <b>Name:</b>  |  |                             |  |                          |  |
| <b>Street:</b>  |  |                             |  | <b>City:</b>             |  |
| <b>County:</b>  |  | <b>State:</b>               |  | <b>Zip:</b>              |  |
| <b>Telephone Number:</b>  |  |                             | <b>Fax Number:</b>                           |                          |  |
|   |  |                             |  | <b>Affiliation</b>       |  |
| <b>INSPECTION INFORMATION</b>   |  |                             |  |                          |  |
|   | <b>NAME</b>  |                             | <b>AFFILIATION</b>                           |                          | <b>PHONE NUMBER</b>                                    |
| <b>Inspectors:</b>  | Ron Shadrach<br>Robert Almquist  |                             | Ohio EPA, DHWM                               |                          | 330-963-1146   |
| <b>Inspection Dates:</b>  | December 12, 2008  |                             |  | <b>Time(s):</b>          |  |
| <b>Inspection Announced?</b>  | Yes <input checked="" type="checkbox"/>  | No <input type="checkbox"/> | <b>If so, how much advance notice given?</b> |                          |  |
| <b>Facility: Rep(s)</b>   | Randy Parker, Shiloh Environmental; Ed Waddles, MTD Environmental, Tom O'Donnell, Shiloh/MTD attorney; Tamara Morman, consultant; Randy Brown, MTD |                             |  |                          |  |

[Shiloh Industries, Inc./December 12, 2008]

[OHD 059 058 263]

Owner/Operator Permanent Cessation Checklist/July 2008

| <b>30-DAY REQUIREMENTS</b>   |  |  |
|--|--|--|
| 1.   | Did the owner/operator of the reporting facility submit a notice of the cessation of all regulated operations (CRO) on a form prescribed by the Director to the following within 30 days of CRO: [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a) ]  |  |
|  | a. Director of Ohio EPA?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|  | b. Local Emergency Planning Committee?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|  | c. Local Fire Department?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 2.   | Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c) ]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 3.   | Did the owner/operator include the following information about the contact person: [ORC §3752.05(B) and OAC rule 3745-352-35(B)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|  | a. Address of principal office of the owner/operator?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|  | b. Business or residence address?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|  | c. Telephone number of contact person?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4.   | Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5.   | If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)]  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| <b>NOTE:</b> The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See pp 5-6 of this checklist.  |  |  |
| <b>90-DAY REQUIREMENTS [ORC §3752.06]</b>  |  |  |
| 6.   | Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(g)]  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| <b>NOTE:</b> The owner/operator may receive approval from the Director to extend the 90-day period. [ORC §3752.06(B) and OAC rule 3745-352-20(A)(3)] |  |  |
| 7.   | Does the owner/operator hold a <b>valid</b> hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(h)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8.   | Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9.   | Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10.  | Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(c)]  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

[Shiloh Industries, Inc./December 12, 2008]

[OHD 059 058 263]

Owner/Operator Permanent Cessation Checklist/July 2008

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|  |   |  |
|--|---|--|
| 11.  | Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(d)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12.  | Did the owner/operator do the following:  |  |
| a.   | Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(d)(i)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <b>OR</b>  |   |  |
| b.   | Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(d)(ii)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <b>OR</b>  |   |  |
| c.   | Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(d)(iii)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13.  | Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(d)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 14.  | Did the owner/operator do the following:  |  |
| a.   | Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(d)(i)].   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <b>OR</b>  |   |  |
| b.   | Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(d)(ii)].   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c.   | Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(d)(iii)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <b>SECURITY &amp; WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]</b> |   |  |
| 15.  | Did the owner/operator secure the facility against unauthorized entry using one or more of the following as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a.   | Boarded, locked or used other means to secure all windows, doors and other potential means of entry?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b.   | Fencing?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c.   | Lighting and a surveillance system?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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Owner/Operator Permanent Cessation Checklist/July 2008

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|   |    |  |  |
|---|----|--|--|
|   | d. | Guard or security service?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | e. | Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 16.   |    | Did the owner/operator post the appropriate warning signs in the following fashion within 30 days of CRO? [ORC §3752.07(A) and OAC rule 3745-352-20(B)]:   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | a. | Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | b. | Are warning signs posted on, or reasonable proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | c. | Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)]  | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|   | d. | Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | e. | Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 17.   |    | Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]  |  |
|   | a. | Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | b. | The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)]   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   | c. | Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)]  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <b>ADDITIONAL MULTI-MEDIA QUESTIONS</b>   |    |  |  |
| If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply. |    |  |  |
| 18.   |    | If the facility has an U.S. EPA I.D. number, has the facility submitted a <i>Notification of Regulated Waste Activity</i> form?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19.   |    | Were there any <90 day accumulation units for hazardous waste?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|   |    | <b>List Where Unit(S) Were/Are:</b>  | Shipping & Receiving and Die Warehouse   |
| 20.   |    | Did the operator close his facility in a manner that: [OAC 3745-66-11]   |  |
|   | a. | Minimizes the need for further maintenance?  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

|   |   |   |  |
|---|---|---|--|
|   | b.  | Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>                           |
|   | c.  | Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04?  | Yes <input checked="" type="checkbox"/> No <sup>2</sup> <input type="checkbox"/> N/A <input type="checkbox"/>              |
| 21.   |   | During the Shiloh partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10?   | Yes <input checked="" type="checkbox"/> No <sup>2</sup> <input type="checkbox"/> N/A <input type="checkbox"/>              |
|   | a.  | Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code?   | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>                           |
| Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <a href="http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos">http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos</a> . |   |   |  |
| 22.   | Will any buildings be demolished? If yes:   |   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>                           |
|   | Has a <i>Notification of Demolition and Renovation</i> form been submitted?   |   | Yes <sup>3</sup> <input type="checkbox"/> No <sup>4</sup> <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 23.   | Are there any wells on the property?  |   | Yes <sup>5</sup> <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>              |
|   | If yes, where are the wells?  | Identified Areas A-1 and C-1 of May 2008 Phase I  |  |
|   | What are the wells used for?  | Assess solvent release to groundwater   |  |
| 24.   | Is there open dumping of solid waste on the property?   |   | Yes <sup>6</sup> <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>              |
|   | <ol style="list-style-type: none"> <li>1. In lieu of the facility now submitting a form, the inspector should submit a copy of the final CRO letter to Central Office's Regulatory and Information Services for I.D. deactivation.</li> <li>2. Supply the facility with the requirements for generator closure and tell them they must close the unit and have documentation that closure was completed (LQGs only).</li> <li>3. Check with the appropriate agency to determine if a form has been received.</li> <li>4. Supply the facility with a form and contact the appropriate agency stating that demolition will occur.</li> <li>5. If used for drinking water, let DDAGW know about the well.</li> <li>6. Let DSIWM know about the open dumping of solid waste.</li> </ol> |   |  |

1. Contact person changed and was not initially updated. Update received.
2. Removal was not completed in 90 days and extension not timely requested. Extension request submitted, security and progress maintained. CRO completed and issue appears resolved.