



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Konecki, Director

September 2, 2010

Tom Hasenmueller
Ohio Screw Products
818 Lowell St.
Elyria, OH 44036

RE: OHIO SCREW PRODUCTS, OHD066067448, LORAIN COUNTY, RTC

Dear Mr. Hasenmueller:

Thank you for your April 2, May 10, June 23 and June 25, 2010 responses to Ohio EPA's February 5, 2010 Notice of Violation / Partial Return to Compliance (NOV/PRTC) letter. The documentation you submitted included a contingency plan and personnel training program, including training documentation. My review of this documentation reveals that Ohio Screw Products has addressed all outstanding violations appearing in Ohio EPA's February 5, 2010 NOV/PRTC letter as listed below.

Letter Citation #	Rule Citation
13.	OAC rule 3745-65-16(A)(1-3)(B)(C)(D)(1-4), Personnel Training
14.	OAC rule 3745-65-52(A)(C)(D)(E)&(F), Content of Contingency Plan

OSP has recently implemented a mop water recycling system. Under OAC 3745-51-02(C)(3), a spent material remains a waste when it is reclaimed. However, since OSP immediately, upon generation of the spent mop water, places the liquid into the first tank of the filtering process, the spent mop water does not need to be counted in OSP's monthly hazardous waste generation calculation under OAC rule 3745-51-05(C)(3). Please note if OSP accumulates the spent mop water prior to filtering, then the liquids would be subject to OSP's monthly hazardous waste generation calculation. Any wastes removed from the filtering process (e.g., from the process tank) would be regulated as hazardous waste and subject to OSP's monthly hazardous waste quantity calculation. Further, this regulatory determination is based on the premise that the spent mop water is reused for a similar, intended purpose (e.g., cleaning activities). Should any of these liquids be disposed prior to or after filtering, their regulatory status would attach at the point of generation and must be managed in accordance with the hazardous waste rules.

OHIO SCREW PRODUCTS
SEPTEMBER 2, 2010
PAGE – 2 –

OSP implemented a process change for the aqueous parts washer (BroCo) unit. The unit will solely be used to process unleaded parts. However, since residual concentrations of lead remain in the unit, OSP will re-evaluate on a quarterly basis any spent washing fluid to confirm OSP's belief that it is a non-hazardous waste.

Based on the aforementioned mop water recycling system and process change, OSP indicated that they have become a small quantity generator (SQG) of hazardous waste. Should OSP generate more than 2,200 pounds of hazardous waste in a month or accumulate more 13,200 pounds of hazardous waste on-site, then the facility must comply with the large quantity generator (LQG) requirements found in OAC rule 3745-52-34(A).

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve OSP from having to comply with all applicable regulations.

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

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