



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

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

RE: OHIO SCREW PRODUCTS, OHD066067448, LORAIN COUNTY, LQG, NOV/PRTC

Dear Mr. Hasenmueller:

On October 1, 2009, Ohio EPA, Division of Hazardous Waste Management (DHWM), conducted a hazardous waste compliance evaluation inspection at Ohio Screw Products (OSP) located at 818 Lowell Street in Elyria, Ohio. The findings of the inspection were provided to OSP in Ohio EPA's Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter dated December 8, 2009.

On January 7, January 8, January 14 and February 1, 2009, OSP submitted documentation concerning waste evaluation information, completed inspection forms and the monthly generation of hazardous waste.

The following is the status of previously identified violations:

1. OAC rule 3745-52-11, Waste Evaluation:

OSP failed to evaluate the following wastes:

- A. This violation was previously abated.
- B. This violation was previously abated.
- C. This violation was previously abated.
- D. This violation was previously abated.
- E. OSP's January 7, 2010 response included waste characterization information for the oily waste and stained soil observed at the former wastewater evaporator shed (south of the Butler building). **Based upon submitted documentation, this violation has been adequately abated.** As discussed, OSP will clean up the oily waste and stained soil and dispose of these wastes at an appropriate facility. Due to current weather conditions, OSP intends to complete the clean up this Spring. Please keep me apprised of these activities.

2. Causing Hazardous Waste to be Transported to an Unpermitted Facility: ORC §3734.02(F):

OSP's January 7, 2010 response indicated that the kerosene will be sent for continued use. **No further information is requested at this time.**

3. ORC §3734.02(E)&(F), Unlawful Storage of Hazardous Waste:

On November 24, 2009, OSP shipped 5,173 gallons of hazardous waste water to a permitted facility after storing it on-site for greater than 90 days. **No further information is requested at this time.**

4. **OAC rule 3745-52-34(A)(2)&(D)(4), Dating Hazardous Waste Accumulation Containers:** This violation was previously abated.
5. **OAC rule 3745-52-34(C)(1)(b), Satellite Accumulation Requirements:** This violation was previously abated.
6. **OAC rule 3745-52-34(D)(5)(b), Emergency Procedures for SQG:** This violation was previously abated.
7. **OAC rule 3745-65-33, Testing & Maintenance of Emergency Equipment:** This violation was previously abated.
8. **OAC rule 3745-66-74, Inspections:**
 - A. This violation was previously abated.
 - B. OSP's January 14, 2010 response included completed inspection forms for containers of hazardous waste water. **Based upon submitted documentation, this violation has been adequately abated. No further response is necessary.**
9. **OAC rule 3745-273-13(D)(1), Universal Waste Management Standards for Small Quantity Handlers:** This violation was previously abated.
10. **OAC rule 3745-273-14(E); Labeling/marking Standards for Small Quantity Handlers of Universal Waste:** This violation was previously abated.
11. **OAC Rule 3745-273-15(C), Accumulation Time Limits - Standards For Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated.

OSP failed to track the length of time that the universal waste lamps were accumulated. To abate this violation, OSP was requested to track the accumulation time through methods identified in OAC rule 3745-273-15(C). Currently, OSP has not addressed this violation. **Submit documentation which demonstrates how OSP will comply with this rule.**
12. **OAC rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:** This violation was previously abated.

Based on the December 2009 and January 2010 monthly inventory reports for hazardous waste generation amounts, OSP remained a large quantity generator (LQG). As such, OSP failed to comply with the following regulations:

13. **OAC rule 3745-65-16(A)(1-3)(B)(C)(D)(1-4), Personnel Training:** Facility personnel must complete training on hazardous waste management and emergency response procedures.

OSP failed to meet the following requirements of this rule:

- A. OAC rules 3745-65-16(A)(1-3): Facility personnel did not complete training that teaches them to perform their duties in a way that ensures compliance with the hazardous waste laws. The personnel training program must be directed by a person trained in hazardous waste management procedures; include instruction on hazardous waste management procedures and contingency plan implementation; and ensure facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.
- B. OAC rule 3745-65-16(B): The facility failed to ensure that employees do not work in unsupervised positions until they have completed the required training.
- C. OAC rule 3745-65-16(C): The facility failed to conduct annual personnel training.
- D. OAC rules 3745-65-16(D)(1-4): The facility failed to maintain the following documents and records at the facility: (1) job titles, as they relate to hazardous waste management, and the name of each employee filling each job; (2) a written job description for each position at the facility, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; (3) a written description of the type and amount of both introductory and continuing training to be given to each person filling a position; and (4) records that document that the training or job experience required by this rule has been given to, and completed by, facility personnel.

To abate this violation, OSP must provide personnel training and submit the personnel training documents required by OAC rule 3745-65-16(D)(1-4).

14. OAC rule 3745-65-52(A)(C)(D)(E)&(F), Content of Contingency Plan:

The contingency plan must describe the actions to be taken to comply with OAC rules 3745-65-51 and 3745-65-56 in response to fires, explosions or unplanned releases of hazardous waste; (C) Describe arrangements with local police, fire, hospitals, contractors, emergency response teams and Ohio EPA to coordinate emergency services; (D) List names, addresses, phone numbers of all persons qualified to act as an emergency coordinator; (E) Include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. This list must be kept up to date and must include the location, and a physical description of each item on the list, and a brief outline of its capabilities. (F) Include an evacuation plan for facility personnel.

OSP failed to maintain a contingency plan that meets all of the requirements of OAC rule 3745-65-52. **To abate this violation, develop and submit a contingency plan that meets the requirements of OAC rule 3745-65-52.** Please be advised that once the plan is developed, all required personnel must be trained on the plan per OAC rule 3745-65-16. Additionally, the plan must be distributed to emergency authorities in accordance with OAC rule 3745-65-53(B).

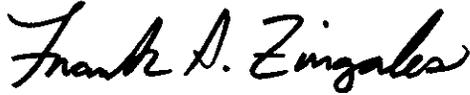
The above violations must be immediately addressed and all of the above requested documentation must be submitted to my attention at the Ohio EPA **within 30 days of receipt of this letter.**

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FEBRUARY 5, 2010
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Present or past instances of non-compliance may continue as subjects of pending or future enforcement actions. 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

ec: Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Nyall McKenna, DHWM, NEDO
Sherry Slone, DHWM, NEDO

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHD066067448 Name: Ohio Screw Products		Website: http://www.ohioscrew.com/ (Optional)
Site Location Information	Street Address: 818 Lowell St. City, Town, or Village: Elyria		State: OH Zip Code: 44036
Site Land Type (check only one) NAICS code(s) www.census.gov/epod/www/w/naics.htm!	County Name: Lorain Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	333512	
Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Dan MI: Last Name: Imbrogno Phone Number: 440-322-6341 Phone Number Extension: E-Mail Address: dimbrogno@ohioscrew.com Fax Number: 440-322-0750 Fax Number Extension:		Street or P.O. Box: City, Town or Village: State: Zip Code:
Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Owner Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:		Date Became Owner (mm/dd/yyyy): Owner Phone #: Country: Zip Code:
	Name of Site's Operator: Operator Type: Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> Street or P.O. Box: City, Town or Village: State:		Date Became Operator (mm/dd/yyyy): Operator Phone #: Country: Zip Code:

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
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UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- Small Quantity Handler of Universal Waste Destination Facility for Universal Waste
 Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more)

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

F001 D040 D008

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Frank Zingales

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
02/05/2010 – date of NOV letter.

Comments:

Facility failed to evaluate various waste streams (see OEPA 12/8/09 NOV letter). After evaluation of wastes, facility found to be a LQG of hazardous waste (see OEPA 2/5/10 NOV letter).