



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

May 1, 2007

**RE: OLYMCO, INCORPORATED/DIVISION OF  
DELTA PLATING, INC.  
OHD 038 954 525  
LARGE QUANTITY GENERATOR OF  
HAZARDOUS WASTE**

William Sklavenitis  
Olymco, Inc.  
2125 Harrison Ave., SW  
Canton, Ohio 44706

Dear Mr. Sklavenitis:

The Ohio EPA Division of Hazardous Waste Management conducted an inspection of Olymco located at 2125 Harrison Ave., SW in Canton, Ohio, on December 12 and 18, 2006. I have received your February 14 and 23, 2007 and April 3, 2007 letters which responded to my notice of violation based on the inspection. Below I outline the current status of those violations and other issues and state what other actions or documentation is required.

The following violations were found:

1. Ohio Revised Code (ORC) 3734.13(D) - Enforcement orders; emergency orders; procedure upon violation.  
Olymco is currently shipping the RO Reject water as a F006 hazardous waste.
2. Ohio Revised Code (ORC) 3734.02(E) and (F) – Unpermitted storage of hazardous waste.  
I agree that the steps Olymco has taken to address this should be sufficient to prevent future occurrences.
3. OAC 3745-65-52(E) – Contingency plan emergency equipment.  
Previously corrected.
4. OAC 3745-52-34(A)(3) – Labeling as hazardous waste.  
Previously corrected.
5. OAC 3745-52-34(A)(2) – Accumulation start date.  
Previously corrected.
6. OAC rule 3745-66-73(A) – Keeping containers closed.  
Previously corrected.

7. OAC rule 3745-279-22(D) - Response to releases of used oil.  
Previously corrected.
8. OAC rule 3745-270-07(A)(6)(b) – Waste analysis data for land disposal restrictions.  
Based on your description, Olymco did not violate this rule. There is a corresponding part (a) to this rule that applies to determinations based solely on knowledge of the waste. Therefore, however it is determined that the waste is restricted, the data used to make this determination must be retained on site in the generator's files.
9. OAC rule 3745-270-07(A)(2) – Land disposal restriction notice sent to receiving facility.  
You have corrected this violation with the exception of waste 5328 which you state will be sent under separate cover.
10. OAC rules 3745-66-92, 3745-66-93, 3745-66-94, and 3745-66-95 – Hazardous waste tank system requirements.  
Olymco is still in violation of the bulk of these rules. You mention that you will arrange for a tank certification after a meeting with Ohio EPA to discuss the RO Reject water. I don't believe your current tank system for this waste can be certified to meet hazardous waste requirements because it does not have a standard secondary containment system. OAC 3745-66-93(D)(4) does allow for "an equivalent device as approved by the director", however, I am not familiar with any such systems.
11. OAC rule 3745-52-20(A) – Manifests – general requirements.  
Please send me a copy of a manifest you have used to ship the RO Reject water as a F006 hazardous waste.
12. OAC rule 3745-270-07(A)(1) – Determining if waste must be treated before being land disposed.  
The land disposal restriction notification form you sent for the F006 R/O reject water (6515) shows your correction of this violation.
13. OAC rule 3745-52-11 – Hazardous waste determination.  
Thank you for the TCLP analytical results which show the polishing waste to be a nonhazardous waste. One use of such results can be as an aid to analyze the process to see what raw materials (such as nickel and chromium) are being lost and to analyze the potential for recovery of these resources from the waste.

William Sklavenitis  
Olymco, Inc.  
May 1, 2007  
Page 3

Your response did not address the cleanup of this waste that was seen on the ground and also did not address any process and/or equipment changes to prevent such contamination. As can be seen in the sample results, this waste contains nickel, chromium, and cadmium. Please respond to these issues.

The following additional issues were found and were responded to in your February 23, 2007 letter:

1. **Rust Preventative Waste**  
I have received the April 3, 2007 letter regarding this. It states that RP 1367 is used to add a shine to black chrome plated parts. You have determined that the waste from this process is not a hazardous waste and is not a used oil.
2. **Hand Line Cleaners and Mild Acid**  
Your letter satisfactorily addressed this issue.
3. **Personnel Training**  
Thank you for the clarification in your letter.
4. **Contingency Plan**  
You plan to update this table.
5. **Material Stored in Chemical Storage Area**  
You are looking into potential buyers for some of this material.
6. **Land Disposal Restrictions**  
You plan to send me an updated waste profile for this waste when it is available. Please note that whether or not it is a F006 hazardous waste does not have anything to do with analytical data for the waste.
7. **Land Disposal Restrictions**  
You have addressed this issue by determining that the D008 waste code does not apply to this waste.

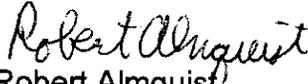
**Please send a written response to this letter within 30 days including the documentation required above.**

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://www.epa.state.oh.us/dhwm/>.

William Sklavenitis  
Olymco, Inc.  
May 1, 2007  
Page 4

If you have any questions, please contact me at (330) 963-1217, or [robert.almquist@epa.state.oh.us](mailto:robert.almquist@epa.state.oh.us).

Sincerely,

  
Robert Almquist  
Division of Hazardous Waste Management

RA:cl

cc: Natalie Oryshkewych, DHWM, NEDO  
Barb Knecht, HZW Environmental

ec: Frank Popotnik, DHWM, NEDO  
Kris Coder, DHWM, NEDO  
Suzanne Prusnek, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Jim Kavalec, DHMW, CO  
Todd Anderson, Legal, CO

**Notice:**

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