



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 Korteski, Director

June 25, 2007

RE: PCC AIRFOILS, INC.
OHD 061-022-414
LAKE COUNTY
RCRA CEI NOV
CESQG

Mr. Jeffery Thomas
Safety Director
PCC Airfoils, Inc.
29501 Clayton Avenue
Wickliffe, OH 44092-1924

Dear Mr. Thomas:

On June 1, 2007, I, representing the Ohio Environmental Protection Agency's (Ohio EPA) Division of Hazardous Waste Management (DHWM), conducted an inspection for compliance with Ohio's hazardous waste regulations, as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC) at PCC Airfoils, Inc., located at 29501 Clayton Avenue, Wickliffe, Ohio. You represented the facility. During the inspection we talked about ways to prevent pollution by reducing waste. My inspection included an inspection of company operations, and a review of written documentation.

PCC manufactures air foil blades, heat shields and other components for the jet engine industry. PCC generates the following hazardous waste streams: filter cake from the treatment of waste water from the plating and other processes; ferric acid (D002); phosphoric acid (D002), sodium and/or potassium hydroxide (pot ash) (D002, D007)(used in the autoclave); waste acid filters (D002, D007); waste fluorescent bulbs (D009); and used oil. The following non-hazardous waste streams are generated: scrap metal (recycled); cardboard (recycled); wax (recycled) ceramic waste (recycled). PCC sends the filtercake to Agmet Metals as a product. Agmet reclaims the metals from the filtercake. PCC was evaluated as a conditionally exempt small quantity generator of hazardous waste.

A copy of our checklist is enclosed for your information. At the time of the inspection, PCC was evaluated for compliance with applicable Hazardous Waste Regulations. The inspection revealed that PCC is in violation of the following regulation:

VIOLATION:

OAC rule 3745-52-34(C)(1)(a), Container Management:

Facilities shall manage hazardous wastes in containers which are: (A) closed (except when adding/removing waste); (B) in good condition (rule 3745-52-34(C)(1)); (C) compatible with wastes stored in them (rule 3745-52-34(C)(1)); and (D) handled in a manner which prevents rupture/leakage.

PCC failed to store/manage hazardous waste in a container which was closed. It was noted during the inspection that there were three 4', and four 8' spent fluorescent bulbs staged near the fluorescent bulb crusher, that were not in a container, nor labeled/dated. It was also noted that PCC manages the fluorescent bulbs as a "Hazardous Waste" rather than a "Universal Waste."

To abate this violation, PCC shall place all of the spent fluorescent bulbs in a container, and keep all containers of hazardous waste closed, except when adding/removing waste. To document compliance, PC shall submit a photograph of the properly closed container to the Ohio EPA's Northeast District Office (NEDO).

Please be advised that you may manage your fluorescent bulbs as a "Universal Waste" and have them recycled, which is the preferred method. The following website contains a list of fluorescent bulb recyclers:

<http://www.epa.state.oh.us/dhwm/pdf/comp.lamp.ballast.list.pdf>. Ohio EPA does not endorse any company, and it is suggested that you evaluate their compliance with all applicable agencies prior to shipping your material. If you elect to manage your fluorescent bulbs as a Universal Waste in the future, the following rules must be complied with:

1. **OAC rule 3745-273-13(D)(1), Lamp Management:**
Small Quantity Generators of Universal Waste Handlers (SQGUWH) shall contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps. All containers or packages shall be closed and lack evidence of leakage, spillage or damage that could cause leakage.
2. **OAC rule 3745-273-14(E), Lamp labeling for SQGUWH:**
Lamps or containers or packages of lamps shall be labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s).
3. **OAC rule 3745-273-15(A), Accumulation Time for SQGUW:**
A small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

PCC should be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste. PCC may make this demonstration by:

- a. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

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- b. Marking or labeling each individual item of universal waste with the date it became a waste or was received;
- c. Maintaining an inventory system on-site that identifies the date each universal waste became waste or was received;
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste became a waste or was received;
- e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or
- f. Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

It was noted during the inspection that PCC has changed their generator status from a large quantity generator (LQG) to a conditionally exempt small quantity generator (CESQG). You are advised to re-notify the Ohio EPA of your current generator status and name change. Please fill out the RCRA Subtitle C Site Identification Form <http://www.epa.state.oh.us/dhwm/notiform.pdf> and return to the Ohio EPA.

POLLUTION PREVENTION:

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes and pollutants that are generated, the second is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. During the inspection, we talked about pollution prevention (P2) opportunities associated with your facility.

The Office of Compliance Assistance and Pollution Prevention provides compliance and pollution prevention assistance on environmental issues related to air, land and water. Their website is: <http://www.epa.state.oh.us/opp/ocapp.html>.

Enclosed you will find a copy of the checklists that we completed during the inspection. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>.

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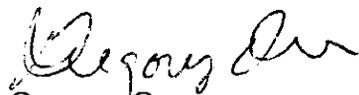
The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>. Please feel free to share this information with your colleagues.

The above violation must be corrected, and documentation of the correction (i.e. copies of documents and photographs) must be sent to this office, to my attention, within thirty (30) days after receipt of this letter.

Failure to list specific deficiencies in this communication does not relieve PCC from the responsibility of complying with all applicable 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 or concerns, please do not hesitate to call me at (330) 963-1189.

Sincerely,



Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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2. Site EPA ID No.	EPA ID Number: OHD 061-022-414
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3. Site Name	Name: PCC AIRFOILS LLC/SMP PLANT Website (optional:)
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4. Site Location Information	Street Address: 29501 CLAYTON AVE.							
	City, Town, or Village: WICKLIFFE					State: OH		
	County Name: LAKE				Zip Code: 44092			

5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcc/www/naics.html	A. 336412			B.				
	C.			D.				

7. Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: JEFFERY			MI: A		Last Name: THOMAS		
	Phone Number: 440-585-3408					Phone Number Extension:		
	E-Mail Address: Thomas@pccsmp.com							
	Fax Number: 440-585-6961					Fax Number Extension:		
	Street or P.O. Box: 29501 CLAYTON AVE.							
	City, Town or Village: WICKLIFFE							
	State: OHIO			Country: USA			Zip Code: 44092	

8. 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.	A. Name of Site's Legal Owner: PCC AIRFOILS LLC				Date Became Owner (mm/dd/yyyy): 07/01/1987					
	Owner Type: Mark with an X		Private	Co	District	Federal	Indian	Municipal	State	Other
			<input checked="" type="checkbox"/>							
	Street or P.O. Box: 29501 CLAYTON AVE.									
	City, Town, or Village: WICKLIFFE					Owner Phone #: 440-585-3100				
	State: OHIO					Country: USA		Zip Code: 44092		
	B. Name of Site's Operator: PCC AIRFOILS LLC				Date Became Operator (mm/dd/yyyy): 07/01/1987					
	Operator Type: Mark with an X		Private	County	District	Federal	Indian	Municipal	State	Other
			<input checked="" type="checkbox"/>							
	Street or P.O. Box: 29501 CLAYTON AVE.									
City, Town, or Village: WICKLIFFE					Operator Phone #: 440-585-3100					
State: OHIO					Country: USA		Zip Code: 44092			

9. Violations Cited?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
<input checked="" type="checkbox"/> Not Regulated

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

A. Hazardous Waste Activities			
(choose only one of the following categories)		<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste
<input type="checkbox"/>	UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	4. Recycler of Hazardous Waste
<input type="checkbox"/>	a. Large Quantity Generator (LQG):	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/>	b. Small Quantity Generator (SQG)	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption
<input checked="" type="checkbox"/>	c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/>	d. United States Importer of Hazardous Waste	<input type="checkbox"/>	6. Underground Injection Control Facility
<input type="checkbox"/>	e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	7. Hazardous Waste Transporter
B. Universal Waste Activities		C. Used Oil Activities	
<input type="checkbox"/>	1. Small Quantity Handler of Universal Waste	<input type="checkbox"/>	1. Used Oil Generator
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		<input type="checkbox"/>	2. Used Oil Transporter Indicate Type(s) of Activity(ies)
<input type="checkbox"/>	2. Large Quantity Handler of Universal Waste	<input type="checkbox"/>	Transporter
(accumulates 5,000 kg or more).		<input type="checkbox"/>	Transfer Facility
<input type="checkbox"/>	3. Destination Facility for Universal Waste	<input type="checkbox"/>	3. Used Oil Processor and/or Re-refiner
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)	
	<u>Generated</u> <u>Accumulated</u>	<input type="checkbox"/>	Processor
A. Batteries	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	Re-refiner
B. Pesticides	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	4. Off-Specification Used Oil Burner
C. Thermostats	X <input type="checkbox"/>	<input type="checkbox"/>	5. Used Oil Fuel Marketer -
D. Lamps	X <input type="checkbox"/>	Indicate Type(s) of Activity(ies)	
		<input type="checkbox"/>	a. Marketer Who Directs Shipment of Off- Specification Oil
		<input type="checkbox"/>	b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D002	D007	D009	
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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

<u>Y / N</u>	Announced ?	Additional Facility Representatives:	JEFFERY THOMAS
<u>Y / N</u>	Tanks?	Other comments:	
<u>Y / N</u>	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
GREG ORR		06/01/2007

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: $\geq 1,000$ Kg. (~300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce < 100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

a.	Container that meets 3745-66-70 to 3745-66-77?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

REMARKS

Name: PCC Airfoils, Wickliffe
ID number: OHD 061-022-414
Inspection date: 06/01/2007

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___

Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A ___ RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A ___ RMK# ___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes ___ No N/A ___ RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A ___ RMK# ___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A RMK#
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A RMK#
- b. Contained the release? Yes No N/A RMK#
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK#
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK#
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK#
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK#
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK#

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A RMK#
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A RMK#
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A RMK#

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A ___RMK#___

G:\WPDOCS\NOV\alside2006usedoilchecklist.wpd