



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 4, 2010

RE: PDI GROUND SUPPORT SYSTEMS, INC.  
OHR 000 023 853  
CUYHOGA COUNTY, LQG  
RETURN TO COMPLIANCE (RTC)

Lou Kish  
Director of Operations  
PDI Ground Support Systems, Inc.  
5905 Grant Ave.  
Cleveland, OH 44105

Dear Mr. Kish:

Thank you for your correspondence dated January 26, 2010 and January 28, 2010 and received on January 28, 2010 and February 1, 2010, respectively, responding to Ohio EPA's NOV letter dated December 18, 2009.

PDI Ground Support Systems, Inc. submitted documentation that included;

- A statement that the existing water curtain paint spray booth will be replaced with a new booth with a 3-Stage Dry filter system, which should eliminate the episodic large quantity generator status events, and negate the associated need for an LQG personnel training program and contingency plan;
- Copies of the waste accumulation area inspections and several completed inspection forms.

My review of this documentation indicates PDI Ground Support Systems, Inc. has adequately demonstrated abatement of the violations from the November 4, 2009 inspection cited in my letter of December 18, 2009, specifically:

**1. OAC Rule 3745-52-11 Waste Evaluation**

**2. OAC Rule 3745-65-51 Purpose and implementation of contingency plan.**

**(A) Each owner or operator shall have a contingency plan for the facility. The contingency plan shall be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water**

**OAC Rule 3745-65-52 Content of contingency plan.**

**(A) The contingency plan must describe the actions facility personnel must take to comply with rules 3745-65-51 and 3745-65-56 of the Administrative Code in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.**

**(B) If the owner or operator has already prepared a "Spill Prevention, Control, and Countermeasures Plan"...or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code.**

**(C) The contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code.**

**(D) The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see rule 3745-65-55 of the Administrative Code), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates.**

(E) The contingency plan must include a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment], where this equipment is required. This list must be kept up to date. In addition, the contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

3. **OAC Rule 3745-65-16(A)(1) Personnel Must Receive Training In A Way That Ensures Compliance**  
**OAC Rule 3745-65-16(A)(2) Training Director Must Be Experienced. Training Must Include Information Pertinent To The Job Position Of The Employee.**  
**OAC Rule 3745-65-16(A)(3) Training Program Must Ensure Personnel Are Able To Respond Effectively To Emergencies**  
**OAC Rule 3745-65-16(B) Personnel Must Complete Training Within 6 Months Of Their Employment Date And Must Not Work Unsupervised Until They Have Completed It**  
**OAC Rule 3745-65-16(C) Personnel Must Take Part In An Annual Review Of The Initial Training**  
**OAC Rule 3745-65-16(D)(1) Facility Must Maintain Employee Name And Job Title Records For Each Hw Mgmt Position**  
**OAC Rule 3745-65-16(D)(2) Facility Must Maintain A Written Job Description For Each Position**  
**OAC Rule 3745-65-16(D)(3) Facility Must Maintain A Written Description Of The Training Given To Each Person**  
**OAC Rule 3745-65-16(D)(4) Facility Must Maintain Records That Document Training Or Job Experience Required By The Rules**  
**OAC Rule 3745-65-16(E) Training Records Must Be Kept Until Closure Or For At Least 3 Yrs From Employees Last Work Date**
4. **OAC Rule 3745- 66-74 Weekly Inspections of Hazardous Waste Containers**
5. **OAC 3745-273-13(D)(1) Small quantity handler must contain lamps in proper containers or packaging and containers or packaging must be closed.**  
**OAC 3745-273-14(E) Small quantity handler must label unit holding universal waste lamps.**

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk  
Environmental Specialist  
Division of Hazardous Waste Management

NJW:ddw

ec: Nyall McKenna, Ohio EPA, DHWM, NEDO  
Marlene Kinney, Ohio EPA, DHWM, NEDO

**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.