



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 1, 2008

RE: **PLASTI-KOTE CO INC
OHD 091 620 369
MEDINA COUNTY
RTC**

Mr. Gino Savarino
Plant Manager
Plasti-Kote
1000 Lake Road
Medina, Ohio 44256

Dear Mr. Savarino:

On November 28, 2008, the Ohio EPA received Plasti-Kote's response to the November 4, 2008 Partial Return to Compliance letter (PRTC). The Plasti-Kote response included the following attachment(s):

A. Analytical results from Ashland on the sand blasting waste.

Based on the information submitted, it appears that Plasti-Kote has adequately addressed the following violation:

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

The following violations were previously abated and required no further action:

2. **Labeling Requirements for Hazardous Waste Containers, OAC 3745-52-34(A) (2).**
3. **Required [Emergency] Equipment, OAC rule 3745-65-32.**
4. **Contingency Plan Requirements, OAC rule 3745-65-52(D).**
5. **Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(A).**
6. **Labeling/marking- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E).**
7. **Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1).**
8. **Accumulation Time for Universal Waste, OAC 3745-273-15(C).**
9. **Employee training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16.**

In addition, the original NOV noted 4 concerns. Only concern 11 required additional action:

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11. While reviewing the land disposal restriction forms (LDR) it was unclear as to whether or not two of the waste streams (profile #0704-06122 and #0210-11567) currently going to Rineco have underlying hazardous constituents (UHCs) which should be noted on the LDR. As we stated during the inspection, if Rineco is treating and testing for all UHCs, then these do not need to be listed on the form. Plasti-Kote should determine if there are any UHCs in the waste above the treatment standards and if so, if Rineco is treating and testing for these constituents. If not, Plasti-Kote needs to amend the LDR form and notify Rineco and submit this information to Ohio EPA.

The November 2008 response stated that Rineco does not test and treat for UHC's, therefore, samples have been collected and results are expected by December 19, 2008.

Please submit these sample results when they become available so that Ohio EPA can determine Plasti-Kote's compliance with the LDR requirements.

Failure to list specific deficiencies and/or violations in this communication does not relieve Plasti-Kote from the responsibility of complying with all applicable laws, rules and regulations.

Further be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN:cj

ec: Harry Sarvis, DHWM, CO
Frank Popotnik, DHWM, NEDO

cc: Natalie Oryshkewych, DHWM, NEDO