



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 30, 2008

CERTIFIED MAIL

Rick Derr
Quala Wash
793 Norton Ave.
Barberton, OH 44203

RE: QUALA WASH, OHD 987 049 681, SUMMIT COUNTY, 2nd NOTICE OF VIOLATION

Dear Mr. Derr:

You have failed to respond to Ohio EPA's December 19, 2007 Notice of Violation (NOV). You must respond to the letter, in writing, and submit all requested information **within 15 days** of the date of this letter:

**1. Emergency Equipment Inspections
OAC 3745-65-33**

All communication and emergency equipment shall be tested and maintained as necessary to assure proper operation in time of emergency...inspections must be recorded in a log or summary.

Emergency equipment is not being inspected per this rule. To abate this violation, you must begin conducting emergency equipment inspections. You must notify this office, in writing, of what the inspection interval will be and you must submit a copy of an inspection form showing that one inspection has been completed.

**2. Content of Contingency Plan- Emergency Equipment
OAC 3734 65-52 (E)**

The contingency plan must also 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, where this equipment is required. In addition, the contingency plan shall include the location and a physical description of each item on the list, and a brief outline of its capabilities. The list must be kept up to date.

The facility contingency plan is incomplete with respect to emergency equipment. It was explained during the inspection that Quala Wash keeps oil dry, absorbent booms/socks, and shovels on hand to clean up spills or releases of hazardous waste. These individual items and their locations are not listed in the contingency plan. To abate this violation, you must update, per this rule, the emergency equipment list in the contingency plan. You must submit a copy of the list to this office.

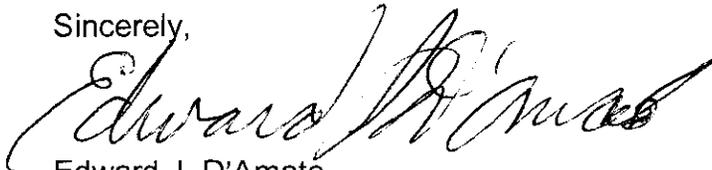
Ohio EPA identified the following items at Quala Wash that may help the facility save money by improving energy efficiency:

1. Steam lines: Virtually none of the steam lines throughout the facility are insulated. Insulating the lines may result in significant energy savings.
2. Waste water treatment room: Quala Wash heats waste water treatment plant room to 75 degrees, primarily to keep a caustic tank heated. The room is un-insulated. It would likely be cheaper to replace the current caustic tank with one that is insulated and heated rather than heating the entire room.
3. There is an opening between the waste water treatment room and a wash bay. Since the wash bay doors are often open, this opening is a source of heat loss from the waste water treatment room. Installing a door or a strip curtain would be a cost-effective way to immediately reduce heat loss from the room.

Failure to list specific deficiencies in this communication does not relieve Quala Wash from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

ec: Frank Popotnik, DHWM, NEDO
Sherry Slone, DHWM, NEDO