



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

April 16, 2008

RE: ROCHLING GLASTIC COMPOSITES  
LARGE QUANTITY GENERATOR  
OHD 990 694 416  
CUYAHOGA COUNTY  
NOTICE OF VIOLATION

Mr. Mark DiGiampietro  
General Manager  
Rochling Glastic Composites  
4321 Glenridge Road  
Cleveland, OH 44121-2891

Dear Mr. DiGiampietro:

On December 5, 2007, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (Ohio EPA) conducted a compliance evaluation inspection (CEI) at Rochling Glastic Composites' (Glastic) facility located at 4321 Glenridge Road, Cleveland, Ohio. Ohio EPA inspected Glastic to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and the rules promulgated thereunder in Chapter 3745 of the Ohio Administrative Code (OAC). Violations and concerns identified by U.S. EPA will be addressed under a separate cover.

The inspection included a review of the facility's operations, as well as the management of wastes. Glastic was inspected for the requirements of a large quantity generator (LQG) of hazardous waste. Robin Kral (Glastic) and Chuck Sisia (consultant) represented the facility during the inspection.

Ohio EPA identified the following violations of Ohio's hazardous waste laws. In order to correct these violations, Glastic must do the following and send me the required information **within 30 days** of the date of this letter:

1. Unpermitted Storage, ORC §3734.02 (E) and (F):

No person shall establish or operate a hazardous waste facility, or use a solid waste facility for the storage, treatment, or disposal of any hazardous waste, without a hazardous waste facility installation and operation permit issued in accordance with §3734.05 of the ORC. No person shall store, treat, or dispose of hazardous waste identified or listed under this chapter and rules adopted under it, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed of, or transport or cause to be transported any hazardous waste identified or listed under this chapter and rules adopted under it to any other premises, except at or to a hazardous waste facility operating under a permit issued in accordance with this chapter or those listed in ORC §3734.02(F)(2) through (5).

Glastic conducted unpermitted storage of hazardous waste. Four, 55-gallon drums of hazardous waste were stored on-site in excess of 90 days without a permit or extension from the director. The containers are described below:

- (a) 55-gallon drum, dated 6/11/07, hazardous waste scrap solvent;
- (b) 55-gallon drum, dated 7/30/07, hazardous waste scrap resin;
- (c) 55-gallon drum, dated 8/22/07, hazardous waste scrap solid/dry material;
- (d) 55-gallon drum, dated 8/23/07, hazardous waste scrap solid/dry material.

**In order to demonstrate efforts towards abating this violation, the facility must arrange for the off-site shipment and disposal of the hazardous waste and submit the supporting documentation for review.**

**Since Glastic violated ORC §3734.02(E) and (F), the facility is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have CRT begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.**

2. Operation and Maintenance, OAC rule 3745-65-31:

Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Glastic failed to control releases of hazardous constituents at the facility. Spillage of wash solvent and resin was noted around the base of the tote wash located in the Tote Wash/Mix Room. The operator of the tote wash unit noted the releases were a routine occurrence.

**In order to abate this violation, Glastic must immediately clean-up and properly manage the release, and indicate how future releases will be prevented. In addition, please submit a photograph demonstrating the release has been cleaned-up.**

3. Satellite Accumulation, OAC rule 3745-52-34(C)(1):

A generator may accumulate as much as 55-gallons of hazardous waste in containers at or near the point of generation where waste initially accumulate, which is under control of the operator of the process.

Glastic was accumulating greater than 55-gallons of hazardous waste at the area located outside the doorway to the Tote Wash/Mix Room. Two, 55-gallon drums of hazardous waste polyester resin were accumulating in this area.

**In order to abate this violation, Glastic must indicate how it will comply with the satellite accumulation area requirements for the polyester resin hazardous waste. In addition, Glastic must conduct retraining of employees on hazardous waste satellite accumulation area requirements and submit documentation of the training for review.**

4. Satellite Accumulation, OAC rule 3745-52-34(C)(1)(a):

Satellite accumulation containers shall always be closed, except when it is necessary to add or remove waste.

The following satellite accumulation containers were open during the inspection:

- (a) 55-gallon drum of hazardous waste epoxy resin (open with empty buckets on top of drum) located outside the doorway to the Tote Wash/Mix Room;
- (b) 55-gallon drum of hazardous waste polyester resin (open with empty buckets on top of drum) located outside the doorway to the Tote Wash/Mix Room; and
- (c) 55-gallon drum of hazardous waste resin (open bung) located at the Product Resin Room/Truck Bay. Violation 4(c) was abated during the inspection.

**In order to abate this violation, Glastic must: ensure satellite accumulation containers are closed when not in use; conduct retraining of employees on hazardous waste satellite accumulation area requirements; and submit documentation of the training for review.**

5. Labeling, OAC rule 3745-52-34(A)(3):

While being accumulated and/or treated on-site, each container must be labeled or marked clearly with the words "Hazardous Waste."

The facility failed to label two, 55-gallon drums with the words "Hazardous Waste." One drum contained hazardous waste scrap solvent and other drum contained hazardous waste scrap resin. Both drums were located at the Indoor 90-day accumulation area (EPA Area). The operator of the area indicated the drums were being used to consolidate hazardous waste.

**In order to abate this violation, Glastic must: ensure all containers of hazardous waste are labeled; conduct of retraining of employees on hazardous waste container management procedures; and submit documentation of the training for review. A procedure for hazardous waste consolidation should be covered in the training.**

6. Dating, OAC rule 3745-52-34(A)(2):

The date upon which each period of accumulation and/or treatment begins must be clearly marked and visible for inspection on each container.

The facility failed to date the following containers of hazardous waste:

- (a) Three, 55-gallon drums of hazardous waste solvent at EPA Area;
- (b) Four, 55-gallon drums of hazardous waste resin at EPA Area; and
- (c) Ten, 55-gallons drums of hazardous waste at the Outdoor 90-day Area.

**In order to abate this violation, Glastic must: ensure all containers of hazardous waste are dated; conduct of retraining of employees on hazardous waste container management procedures; and submit documentation of the training for review.**

7. Open Container, OAC rule 3745-66-73(A):

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

The following containers of hazardous waste were open during the inspection:

- (a) 55-gallon drum of hazardous waste solvent at the Pultrusion 90-day Area;
- (b) 55-gallon drum of hazardous waste resin/debris at the Pultrusion 90-day Area (drum overfull and unable to close); and
- (c) Several 55-gallon drums of hazardous waste resin at the Outdoor 90-day Area (the drum lids were not squarely placed on top of the drum).

**In order to abate this violation, Glastic must: ensure all containers of hazardous waste are closed; conduct of retraining of employees on hazardous waste container management procedures; and submit documentation of the training for review.**

8. Used Oil Labeling, OAC rule 3745-279-22(C):  
Containers used to store used oil at generator facilities must be labeled or marked clearly with the words “used oil.”

The facility failed to label four, 5-gallon containers of used oil with the words “used oil.” The containers were located R & D Area of the facility.

**In order to abate this violation, Glastic must submit photographs demonstrating all containers of used oil are appropriately labeled.**

9. Universal Waste Labeling, OAC rule 3745-273-14(E):  
Each lamp or a container or package in which universal waste lamps are contained must be labeled or marked clearly with one of the following phrases: “Universal Waste Lamps,” or Waste Lamps,” or “Used Lamps.”

The facility failed to label a box containing 4 foot lamps with one of the following phrases: “Universal Waste Lamps,” or Waste Lamps,” or “Used Lamps.”

**In order to abate this violation, Glastic must submit photographs demonstrating all containers of universal waste lamps are appropriately labeled.**

Concerns:

10. During the inspection, Ohio EPA observed two spill trays containing raw product resin. The trays are used to collect resin drippings/spillage that occurs when the house couplings associated with the four resin product tanks are disconnected. The trays were located in the Product Resin Room. **Please notify Ohio EPA how this resin will be managed and submit photographs demonstrating the area is cleaned-up.**
11. The facility is required by OAC rule 3745-65-35 to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination to any area of the facility operation in an emergency. Minimal aisle spacing was observed at the Outdoor 90-day hazardous waste accumulation area. **The facility should improve the aisle spacing at this area.**

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please feel free to contact me or OCAPP. OCAPP may be contacted at: 800-329-7518 or <http://www.epa.state.oh.us/opp/ocapp.html>.

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.

ROCHLING GLASTIC COMPOSITES  
APRIL 16, 2008  
PAGE - 5 -

Enclosed you will find a copy of the checklists that we completed during the inspection. Should you have any question, please feel free to call me at (330) 963-1278. You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Wade Balsler  
District Representative  
Division of Hazardous Waste Management

WB:ddw

Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO  
Robin Kral, Rochling Glastic Composites  
ec: Harry Sarvis, DHWM, CO

**NOTICE:**

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