



State of Ohio Environmental Protection Agency

Northeast District Office

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

June 10, 2008

RE: ROCHLING GLASTIC COMPOSITES
LARGE QUANTITY GENERATOR
OHD 990 694 416
CUYAHOGA COUNTY
PRTC

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

Dear Mr. DiGiampietro:

On May 16, 2008, the Ohio Environmental Protection Agency (Ohio EPA) received Rochling Glastic Composites' (Glastic) response to the Ohio EPA's April 16, 2008 notice of violation letter.

Glastic submitted a response to each violation along with supporting documentation. Ohio EPA's review of this documentation is summarized below. Please respond to violations 4 and 7 **within 30 days** of the date of this letter.

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

Glastic submitted a December 12, 2007 hazardous waste manifest documenting the disposal of a 55-gallon drum of hazardous waste scrap solvent and a 55-gallon drum of hazardous waste resin. The accumulation start date of the hazardous waste scrap solvent drum is not clearly legible.

Glastic indicated the two 55-gallon drums of hazardous waste scrap resin contaminated debris were inspected by the facility personnel after the inspection. The facility stated the drums no longer contained liquids and were classified and disposed as non-hazardous waste.

No further action is required at this time. However, 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 Glastic begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

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

Glastic submitted photographs of the tote wash unit after housekeeping/cleanup activities were performed. In addition, the facility submitted documentation of maintenance activities to repair and reduce solvent leaks/spillage.

This violation has been abated and no further response is required.

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

Glastic indicated and explained that the two, 55-gallon drums of hazardous waste polyester resin were generated from separate processes. This information was not communicated to Ohio EPA during the inspection.

This violation has been rescinded based upon the information provided.

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

The facility indicated that they have informed production staff to leave the small containers upside down on the satellite drums for an entire shift to ensure all resin is drained. Annual hazardous waste training, including satellite accumulation requirements, was conducted in April and May 2008.

Based upon Ohio EPA's observations, the buckets on top of satellite drums identified in 4(a) and 4(b) were empty during the inspection.

Ohio EPA will accept a written procedure as described by the facility for emptying/draining small resin containers into satellite accumulation drums. The facility should also consider additional physical means to empty the containers. **In order to abate this violation, Glastic must submit a written procedure that describes how the containers will be emptied.**

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

Glastic submitted documentation of annual hazardous waste training conducted in April and May 2008; conducted one-on-one training with the employee responsible for the EPA area; and installed signs at the hazardous waste labeling stations.

This violation has been abated and no further response is required.

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

Glastic submitted documentation of annual hazardous waste training conducted in April and May 2008. The ten, non-dated 55-gallons drums of hazardous waste at the Outdoor 90-day Area were documented by Ohio EPA.

This violation has been abated and no further response is required.

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

Glastic submitted documentation of annual hazardous waste training conducted in April and May 2008; and conducted one-on-one training with the employee responsible for the EPA area.

The 55-gallon drum of hazardous waste solvent at the Pultrusion 90-day Area was open (the lid was not properly and securely affixed to the container). The facility may want to install a funnel screwed into a bung hole that is secured with a lid. See Ohio EPA's Closed Containers guidance document, June 2004 at: <http://www.epa.state.oh.us/dhwm/quidancedocuments.html>

In order to abate violation 7(a), Glastic must submit a photograph that demonstrates the hazardous waste solvent 55-gallon drum at the Pultrusion 90-day Area is closed when not in use. Violations 7(b) and 7(c) have been abated and no further response is required.

8. Used Oil Labeling, OAC rule 3745-279-22(C):

The facility submitted a photograph of a 5-gallon container labeled with the words "used oil" and implemented a used oil stenciling program.

This violation has been abated and no further response is required.

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9. Universal Waste Labeling, OAC rule 3745-273-14(E):
The facility submitted photographs showing universal waste lamp boxes were properly labeled.

This violation has been abated and no further response is required.

Concerns:

10. Glastic submitted photographs of the area and installed drip less hose connections to address this issue. No further response is required.
11. Glastic had aisle spacing, and the rule does not specify a measured distance. This concern was raised as an area for improvement. No further response is required.

Based on the nature and/or number of violations found during the inspection, Glastic will be referred to DHWM's Enforcement Coordinator for escalated enforcement consideration. However, the final decision on whether to pursue escalated enforcement action, including civil penalties, lies with the Director.

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

cc: Robin Kral, Rochling Glastic Composites
Frances Kovac, DHWM Legal, CO
Duncan Campbell, USEPA, Region 5

ec: Natalie Oryshkewych, DHWM, NEDO

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.