



**Environmental
Protection Agency**

John R. Kasich, **Governor**
Mary Taylor, **Lt. Governor**
Scott J. Nally, **Director**

May 3, 2011

**RE: SIGMA OHIO INDUSTRIES, PLANT 3
GEAUGA COUNTY
OHD 004 172 276
COMPLAINT # 7422**

Joe McFarland, Industrial/Safety Engineer
Sigma Ohio Industries
149 S. Cucumber St.
Jefferson, Ohio 44047

Dear Mr. McFarland:

On April 6, 2011, John Paquelet and I conducted a complaint investigation at your facility. The complaint, in general, alleged containers of potentially hazardous waste outside were leaking. We reviewed the containers outside with you and Bruce Bassett. Many containers were brought over from your other plant in Ashtabula that had closed. You indicated these were non-hazardous slip-coats, oils, wastewaters and resins. Although we found no leaking containers of hazardous waste at the time of our inspection, we did note the following violations:

1. Unlabeled Containers of Used Oil - OAC3745-279-22(C)

Three totes of used oil were not labeled with the words "used oil" as required. Please submit a picture or other documentation that demonstrates these containers have been labeled appropriately.

2. Release of Used Oil - OAC 3745-279-22(D)

An open blue plastic garbage can contained a smaller container of used oil. The garbage can was overflowing with rain water and there was a sheen on the water on the ground near this container. Apparently the smaller container was leaking some oil which was then overflowing from the garbage can to the ground.

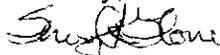
This rule requires that you stop the release, contain the released used oil, clean-up and manage properly the released used oil and other materials, and repair or replace the leaking container. You indicated that you would take care of this immediately. Please document that you have performed these clean-up steps.

Please submit the above documentation to this office within 30 days of the date of this letter. The rules cited can be found at http://www.epa.ohio.gov/dhwm/laws_regs.aspx. Additional information about the requirements for managing used oil can be found at <http://www.epa.ohio.gov/Default.aspx?tabid=3923>.

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Should you have any questions related to this letter, please contact me at (330) 963-1226.

Sincerely,



Sherry K. Slone, PE
District Engineer
Division of Materials and Waste Management

SKS/cl
Enclosures

ec: Natalie Oryshkewych, DMWM, NEDO
Nyall McKenna, DMWM, NEDO
John Paquelet, DMWM, NEDO
Jeff Mayhugh, DMWM, NEDO

cc: Marlene Kinney, DMWM, NEDO