



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

July 30, 2007

RE: SPECTRUM METAL FINISHING  
LARGE QUANTITY GENERATOR  
OHD 004 229 506  
MAHONING COUNTY  
NOV 5

Mr. Neil Chrisman  
Spectrum Metal Finishing  
535 Bev Road  
Youngstown, OH 44512

**CERTIFIED MAIL**

Dear Mr. Chrisman:

On February 6, 2006, the Ohio Environmental Protection Agency (Ohio EPA) issued a Notice of Violation (NOV) to Spectrum Metal Finishing (Spectrum). To date, Spectrum has failed to respond to the NOV letter.

In order to correct outstanding violations, Spectrum must do the following and send me the required information **within 15 days** of the date of this letter:

4. Contingency Plan, OAC rule 3745-65-52:  
Spectrum's submitted contingency plan was found to be deficient. **In order to abate this violation, Spectrum must submit a revised contingency plan. The revised contingency plan must contain the following information:**

- The contingency plan failed to identify the necessary reports the owner or operator must make in accordance with OAC rule 3745-65-56(J) in response to incidents requiring implementation of the contingency plan.
- The contingency plan failed to list the home address of the primary and alternate emergency coordinators.
- The revised contingency plan failed to include a list of all emergency equipment (fire control, spill control, communication and alarm systems, and decontamination equipment) at the facility. This list must include the location and physical description of each item on the list, and a brief outline of its capabilities. The facility should consider adding a facility map to the plan which identifies the locations of emergency equipment.
- The contingency plan failed to describe evacuation routes and alternate evacuation routes. The facility should consider adding a facility map to the plan which identifies the evacuation routes.
- The facility failed to submit documentation (cover letter and/or certified mail receipts) that demonstrates the plan was distributed to all emergency authorities (fire, local police, hospitals, Ohio EPA, and local emergency response teams) pursuant to OAC rule 3745-65-53.

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In addition, the following errors were noted in the contingency plan and should be corrected:

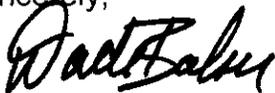
- Page 1, the paint booth sludge EPA waste code's should include "D001."
- Page 1, the spent wipes EPA waste code states "Pending." Please inform Ohio EPA how the spent solvent wipes are being managed.
- Page 1, the F019 hazardous waste hopper does not qualify as a satellite accumulation area, unless the container is managed in accordance with OAC rule 3745-52-34(C).

An example contingency plan (ABC Facility) is available in Ohio EPA's Generator Handbook, November 2005, at:  
<http://www.epa.state.oh.us/dhwm/guidancedocuments.html>

10. Land Disposal Restrictions, OAC rule 3745-270-07:  
Spectrum failed to submit a LDR form for the F019 hazardous waste stream. **In order to abate this violation, Spectrum must submit a completed LDR form for the F019 hazardous waste .**

Should you have any questions, 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: David McCleery, Spectrum Metal Finishing  
Natalie Oryshkewych, DHWM, NEDO  
ec: Frances Kovac, DHWM, Legal  
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.