



State of Ohio Environmental Protection Agency

Northeast District Office

File

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

March 27, 2008

RE: STEERE ENTERPRISES
OHD004160511
SUMMIT COUNTY
NON-GENERATOR CEI NOV

Colleen Finegan, Environmental Representative
Steere Enterprises
285 Commerce St.
Tallmadge, OH 44278

Dear Ms Finegan:

On March 11, 2008, Bill Lutz and I conducted a hazardous waste compliance evaluation inspection of your facility. The purpose of the inspection was to determine Steere's compliance with the hazardous waste laws as found in the Ohio Revised Code (ORC) Chapter 3734 and with the hazardous waste rules as found in the Ohio Administrative Code (OAC) Chapter 3745. You and Mr. Brown represented Steere during the inspection.

We understand Steere does injection and blow molding of plastic parts primarily for the automotive industry. There are four buildings on the property. One is the main manufacturing plant (plant #1) where the molding takes place. Another is the warehouse for raw materials and end products. A third building is a small metal storage shed and the fourth is the former dip mold plant (plant #2). The dip mold business was sold May 1, 2006 and this building is now leased to another company.

Mr. Brown stated Steere stopped using solvents in the production area about 10 years ago. Steere no longer routinely generates any hazardous waste and none were noted being stored on-site other than universal wastes at the time of the inspection.

The following violations were noted.

1. Used Oil Container Labels – OAC 3745-279-22(C)

Used oil is defined as 'any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result is contaminated by physical or chemical impurities'. All containers of used oil anywhere in the facility must be labeled with the specific words 'used oil'. There were at least five drums and one 5-gallon pail of waste hydraulic oil in plant #1 that were not labeled "used oil". There were also five drums of waste hydraulic oil and absorbents in plant #2 that need to be evaluated and if they contain used oil they must be labeled as such.

See USEPA's discussion of used oil at:

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/E5EB46D12DF8F9EF8525670F006C2C68/\\$file/14090.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/E5EB46D12DF8F9EF8525670F006C2C68/$file/14090.pdf). Also see Ohio EPA's discussion of oily rags and debris at: <http://www.epa.state.oh.us/dhwm/searchdocs/kgraziano12904/>.

Please label all containers of used oil with the words "used oil". Submit a photo demonstrating the proper labeling and describe what protocol has been established to insure containers are properly labeled in the future.

2. Used Battery Labels – OAC 3745-273-14(A)

One box of waste batteries was being stored on the shelving unit with spent fluorescent lamps in plant #1. It was labeled "bad batteries" rather than "waste batteries", "used batteries" or "universal waste-batteries". Please submit a picture documenting the box has been labeled appropriately.

3. Universal Waste Lamps Containerized – OAC 3745-273-13(D)(1)

At least two spent fluorescent lamps were placed on the shelving unit but not containerized. Please submit a picture documenting that these lamps have been properly containerized.

4. Broken Lamp Container Label – OAC 3745-273-14(E)

One drum contained broken fluorescent lamps but needed to be labeled 'waste lamps', 'used lamps', or 'universal waste – lamps'. Please submit a picture documenting this drum has been properly labeled.

One concern was noted during the inspection. We understand that when Steere was a large quantity generator of hazardous waste, the accumulated hazardous waste was stored in the southeastern portion of plant #2. This area is no longer used for that purpose. In accordance with OAC 3745-52-34(A)(1)(e) and 3745-66-11(A) and (B), Steere needs to 'close' this area. Please see the fourth bullet item titled 'Closure Requirements for Generators' at: <http://www.epa.state.oh.us/dhwm/guidancedocuments.html>. Please submit information documenting this area has been properly 'closed'.

Please submit all of the above requested documentation to my attention within 30 days of the date of this letter. Enclosed are copies of the checklists completed for this inspection. Copies of the rules and other helpful information can be found on our web page at: www.epa.state.oh.us/dhwm.

Steere has reduced its hazardous waste to minimal amounts but additional pollution prevention information can be found at: www.epa.state.oh.us/opp. Also 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. We encourage you to sign-up for this free service at: <http://www.epa.state.oh.us/dhwm/listserv.html>

If you have any questions concerning this letter please call me at (330)-963-1226.

Sincerely,



Sheryl K. Slone, P.E.
Environmental Engineer
Division of Hazardous Waste Management

SKS:ddw
Enclosure

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Bill Lutz, DHWM, NEDO
Harry Sarvis, DHWM, CO

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
 IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
 tammy.mcconnell@epa.state.oh.us or mail it to Tammy
 McConnell, Central Office

2. Site EPA ID No.	EPA ID Number: <u>OH 004 160 511</u>								
3. Site Name	Name: <u>Steere Enterprises, Inc</u>				Website: (Optional) <u>www.steere.com</u>				
4. Site Location Information	Street Address: <u>285 Commerce St.</u>								
	City, Town, or Village: <u>Tallmadge</u>				State: <u>OH</u>				
	County Name: <u>Summit</u>				Zip Code: <u>44278</u>				
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html									
7. Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: <u>Colleen</u>		MI:		Last Name: <u>Finegan</u>				
	Phone Number: <u>330</u>				Phone Number Extension:				
	E-Mail Address: <u>cf@steere.com</u>								
	Fax Number: <u>330 633 3921</u>				Fax Number Extension:				
	Street or P.O. Box: <u>285 Commerce St.</u>								
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Commercial Section of another copy of this form page.	City, Town or Village: <u>Tallmadge</u>		State: <u>OH</u>		Country: <u>USA</u>		Zip Code: <u>44278</u>		
	Name of Site's Legal Owner: <u>Steere Enterprises, Inc.</u>				Date Became Owner (mm/dd/yyyy): <u>1962</u>				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <u>285 Commerce St.</u>								
	City, Town or Village: <u>Tallmadge</u>				Owner Phone #: <u>330 564 1888</u>				
State: <u>OH</u>				Country: <u>USA</u>		Zip Code: <u>44278</u>			
9. Violations Cited? 10A. Type of Regulated Waste Activity (Mark 'X' in all of the appropriate boxes)	Name of Site's Operator: <u>same</u>				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: <u>285 Commerce St.</u>								
	City, Town or Village: <u>Tallmadge</u>				Operator Phone #: <u>330 564 1888</u>				
	State: <u>OH</u>				Country: <u>USA</u>		Zip Code: <u>44278</u>		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))

Small Quantity Handler of Universal Waste Large Quantity Handler of Universal Waste
 Destination Facility for Universal Waste (accumulates 5,000 kg. or more)

Check all boxes below that apply for each of the three types of facilities above.

10C. Used Oil Activities (Indicate Type(s) of Activity(ies))

	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	COLLEEN FINEGAN
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

13. Name of Inspector(s) _____ Date of Inspection Time (mm/dd/yyyy) (hh:mm) _____

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)
	Curtis R. Brown C.F.O.	03/11/2008

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: STEERIS ENTERPRISES
 Facility Type: LQG/SGQ/CESQG/TSD
 Date of Inspection: 3-11-2008
 EPA ID #: OHDCOA 160 511

Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	lighting fluorescent lamps, HID lamps (CW)	varies	storage	ashland or CSI for recycling	recycle	
2	Clean-up oily rags	varies	"	"	"	investigate laundering & reuse
3	Machines hydraulic oil	couple drums/mc.	"	"	"	
4	Injection Molding plastic scraps	-	grind & reuse		reuse	
5	Metal cans aerosol cans	varies		ashland or CSI for recycling	recycle	

6	electronic	electronic	varies	storage	donate for reuse		
7	Production	Pallets	"	reuse	reuse	reuse	
		Cardboard	"	recycle	recycle	recycle	
		Pop cans			recycle	recycle	
	Maintenance	Solvent	varies	in Parts Cmn	in Parts Washer	Continued Use	
9		Lithium Batteries (UW)	"	storage	Ashland or CSI	recycle	

REMARKS-GENERAL INFORMATION

General Process Information:

Steve does injection and blow molding of plastic parts primarily for the automotive industry.

Regulatory/Enforcement History (if applicable): *NA*

Additional P2 remarks and information: *—*

Would this facility be interested in a P2 assessment? Yes* No *Maybe*

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: *Safety Equipment needed: steel toe shoes, safety glasses*

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___RMK#___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK#___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A RMK#___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No N/A ___RMK#___
- b. Mix battery types in one container? Yes No ___ N/A ___RMK#___
- c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___RMK#___
- d. Regenerated used batteries? Yes ___ No N/A ___RMK#___
- e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___RMK#___
- f. Remove batteries from consumer products? Yes ___ No N/A ___RMK#___
- g. Remove the electrolyte from the battery? Yes ___ No N/A ___RMK#___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No N/A ___RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A RMK# ___
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A RMK# ___
- b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A RMK# ___
7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes ___ No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes ___ No N/A ___ RMK# ___
at least 2 lamps were not in a container.
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No N/A ___ RMK# ___
broken lamps were placed in a closed drum.
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes ___ No N/A ___ RMK# ___
cardboard boxes were properly labelled, however drum of broken lamps needs the proper labels

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

NOTE: *Accumulation is defined as date generated or date received from another handler.*

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK# *< 6 months since last shipment off-site*

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

NOTE: *SQUWHs are prohibited to send waste to any other facility.*

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No N/A RMK# UNKNOWN
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No N/A RMK#
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A RMK# ___
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A RMK# ___
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No N/A RMK# ___
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK# ___
- a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No N/A RMK# ___
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No N/A RMK# ___
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No N/A RMK# ___

REMARKS

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

11. If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc



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

May 12, 2008

RE: STEERE ENTERPRISES
OHD004160511
SUMMIT COUNTY
NON-GENERATOR CEI RTC

Curt Brown, CFO
Steere Enterprises, Inc
285 Commerce St.
Tallmadge, OH 44278

Dear Mr. Brown:

Thank you for your letter and documentation responding to our March 27, 2008 notice of violation. The information we received on May 1, 2008, included photographs and written work procedures documenting proper management and labeling of used oils, lamps, and batteries. Also, an inspection report from 2006 related to the former hazardous waste accumulation area was received. Our review of this information reveals that Steere Enterprises has returned to compliance with all of the rules previously cited.

Concerning your closure of the former hazardous waste generator storage area in the southeastern portion of plant #2, our visual inspection of this area found it clean and free of cracks. Based upon your review of your inspection records for this area, you have asserted that Steere Enterprises met the closure performance standards as specified in OAC 3745-66-11(A) and (B).

No further response or information is needed at this time. If you have any questions concerning this letter, please call me at (330) 963-1226.

Sincerely,

Sheryl K. Slone, P.E.
Environmental Engineer
Division of Hazardous Waste Management

SKS:ddw

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Bill Lutz, DHWM, NEDO
Harry Sarvis, DHWM, CO