



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 24, 2009

RE: STRICKER REFINISHING  
HAZARDOUS WASTE TANK ASSESSMENT  
OHD987033420

Greg Stricker  
Stricker Refinishing  
2060 Hamilton Ave.  
Cleveland, OH 44114

Dear Mr. Stricker:

The Engineering Section of the Division of Hazardous Waste Management has completed their review of the hazardous waste tank assessment that was submitted, by Eagle Technologies, to Donna Kniss of our Division of Surface Water on June 30, 2008. The assessment was provided for a 3150 gallon double walled polyethylene tank installed in February 2008 and used to store corrosive hazardous waste at the above facility.

The following deficiencies were noted.

1. **Design Standards for New Tank System or Components – OAC 3745-66-92(A)(1)** *The written assessment must include the design standards according to which the tank and ancillary equipment is constructed.*

The submitted assessment states that the tank was not manufactured to ASTM or related standards but to industry standards. A technical bulletin was provided from the manufacturer. Design standards according to which the tank and ancillary equipment were constructed must be cited in the assessment or detailed calculations (i.e. thickness, loading pressures, corrosion, etc.) should be provided to demonstrate that the system is constructed in accordance with sound engineering principles and will safely contain the hazardous waste.

2. **Installation Inspection of New Tank System – OAC 3745-66-92(B)** *The owner or operator of a new tank system must ensure that proper handling procedures are adhered to in order to prevent damage to the system during installation. Prior to placing a new tank system or component in use, an independent qualified installation inspector or an independent, qualified registered professional engineer must inspect the system.*

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Since the system is already installed, it will be necessary for an independent qualified installation inspector or an independent qualified registered professional engineer to perform a visual inspection of the installed system for any structural damage or inadequate construction or installation as described in OAC 3745-66-92(B) through (F) as applicable.

Please address these two deficiencies immediately and provide documentation that you have returned to compliance with these rules within 60 days of the date of this letter. If you have any questions related to this letter, please contact me at (330) 963-1226.

Sincerely,



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

SKS:ddw

ec: Donna Kniss, DSW, NEDO  
Nyall McKenna, DHWM, NEDO  
Shawn Sellers, DHWM, CO