

**Environmental
Protection Agency**

Director, Governor
Lt. Governor
Director

August 4, 2010

Dave Miller
Best Mold & Manufacturing
1874 Englewood Ave.
Akron, OH 44312

**RE: BEST MOLD & MANUFACTURING, OHD 089 900 187, SUMMIT COUNTY, CEI, NOTICE
OF VIOLATION/ RETURN TO COMPLIANCE**

Dear Mr. Miller:

On July 20, 2010, Ohio EPA's Division of Hazardous Waste Management, represented by Edward D'Amato, inspected Best Mold & Manufacturing for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC). Best Mold & Manufacturing was represented by you.

Best Mold & Manufacturing makes metal machinery parts for heavy industry. The facility is a conditionally exempt small quantity generator of hazardous waste (<220 lbs per month).

The following waste streams were identified:

- Waste paint-related material, approximately 55 gallons/year (D001, D035, F003, F005).
- Used oil.
- Universal waste lamps.

The following violations were found:

**1. Used Oil Storage Requirements for Generators (Labels)
OAC 3745-279-22(C)**

Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil"

There were 2 drums of used oil that were not labeled per this rule. This violation was corrected during the inspection when you put used oil labels I provided on the drums. No further action is required regarding this violation.

**2. Management of Containers
OAC 3745-66-73(A)**

A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste

The 5-gallon container used for accumulating paint waste was not closed per this rule. This violation was corrected during the inspection when the container was closed. No further action is required regarding this violation.

Ohio EPA has the following suggestions for Best Mold & Manufacturing. Best Mold & Manufacturing is under no obligation to implement any of them. Please note that any links to specific companies are provided for informational purposes. Ohio EPA does not recommend or endorse specific products or companies. Best Mold & Manufacturing should thoroughly research as many companies as possible. This information was also sent to you via e-mail on July 29, 2010:

1. Best Mold & Manufacturing may benefit from an energy audit. The US Department of Energy has an energy assessment program. More information can be found at:
<http://www1.eere.energy.gov/industry/saveenergynow/assessments.html>

USDOE also offers financial incentives for industry to invest in energy efficiency and alternative energy projects:
<http://www.energy.gov/energyefficiency/financing.htm>

The Ohio Department of Development, Office of Energy Efficiency offers various resources to assist Ohio companies in reducing energy usage. More information can be found at:
http://development.ohio.gov/cdd/oeec/industry_services.htm

One area in particular where Best Mold & Manufacturing may be able to save money in a relatively short pay-back time is through energy efficient lighting. Below are two links to case studies of re-lamping projects in industrial settings:

Arizona Republic newspaper plant, 35 month payback:
<http://www.earthsavers.com/brochures/Industrial.pdf>

A Caterpillar Paving Products, 18 month payback:
http://6cp.us/1/email_builder/pview/16672/MTQz.html

Daylighting may also be an option to consider. Studies have shown that, in addition to energy savings, daylighting can increase employee productivity:

Federal Energy Managers See Daylight To Energy Savings
http://www1.eere.energy.gov/femp/news/news_detail.html?news_id=7148

Day & Nite Solar Lite:
<http://www.cooldaylight.com/>

Daylighting systems, Pfister Energy:
<http://pfisterenergy.com/daylighting.asp>

2. You may be interested to know that the Ohio Department of Development offers financial assistance to businesses for capital investment needs such as: renovation, equipment purchases, land and building acquisition, construction, and expansion. More information can be found at: http://www.odod.state.oh.us/EDD/Loans_Grants.htm

You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at: <http://www.epa.ohio.gov/ocapp> is also a good source of information.

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The Division of Hazardous Waste Management has created an electronic news service to provide timely updates on rule changes and other news related to hazardous waste in Ohio. We encourage you to sign-up for this free service at:

http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Enclosed is a copy of the checklists used for the inspection.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Failure to list specific deficiencies or violations in this communication does not relieve Best Mold & Manufacturing from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Enclosure

ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO