



**Environmental
Protection Agency**

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

April 21, 2011

**RE: WESTERN ROTO ENGRAVERS, INC.
LARGE QUANTITY GENERATOR
OHD 981 960 958
MEDINA COUNTY
NOTICE OF VIOLATION**

Dean Ellebruch
Plant Manager
Western Roto Engravers, Inc.
668 Seville Road
Wadsworth, Ohio 44281

Dear Mr. Ellebruch:

This is a follow up to a March 23, 2007 letter (enclosed) prepared by WER/ColorTech and signed by Mr. Larry D. Long. Ohio EPA has yet to receive the final report prepared by a professional engineer verifying the hazardous waste tank assessment, installation, and secondary containment coating. This fact was noted during a recent file review.

You will remain in violation of the following rules until the violations have been adequately addressed.

**1. New Tank System Design Assessment
[OAC 3745-66-92(A)]**

The professional engineer (PE) who prepared and stamped/certified the assessment is not registered in the state of Ohio. In accordance with ORC 4733.23, Ohio EPA cannot accept or use any engineering plan that was not prepared by an Ohio registered PE. WRE must provide a written assessment prepared by a PE registered with Ohio's State Board of Registration for Professional Engineers.

Because of the age of the tank system (installed in 1988) there is little initial design information available for review. The PE makes several judgments and conclusions on the tank system fitness based on visual inspection. However, the PE does not provide a date (or dates) for when these assessments took place. Any conclusions of tank system fitness based on visual inspection should include specific dates of the inspection.

To ensure the ongoing fitness of the tank system, the written assessment should speak to the expected service life of the tanks and related planned periodic maintenance activities.

**2. New Tank System Installation Statements
[OAC 3745-66-92(G)]**

The submitted information did not include a written statement by those persons who supervised installation as required by OAC 3745-66-92(G). No such certification of installation information was available from 1988. Alternatively, the PE relies on his visual inspection/written assessment to conclude that the tank is fit for continued use. While this is an appropriate approach when installation information is missing, the PE needs to address all of the noted deficiencies related to the tanks.

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3. **Secondary Containment for New Tanks**
[OAC 3745-66-93]

Paragraph (C) of OAC rule 3745-66-93 requires a liner to be constructed of material that is compatible with the waste. The assessment includes a statement in Section 2.4 that the concrete liner is compatible with dilute sulfuric acid solutions. This statement needs to be substantiated with appropriate citations to concrete reference documents or standards. In general, standard portland cement concrete has very little resistance to acids and salts. Acids readily attack the calcium-based binder in portland cement. Often concrete is sealed with a material that would prevent the acids from coming in contact with the concrete to address this compatibility issue. Please indicate how you will address this issue.

Secondary containment for the tanks consists of an external concrete liner. Total containment capacity noted in the assessment (Section 2.4) is 5,450 gallons. A containment capacity of 2,450 gallons was calculated based on the dimensions provided. Since the largest tank volume is 1,500 gallons, the 2,450 capacity still meets the requirements of OAC rule 3745-66-93 (E) to contain 100% of the largest tank volume in the containment boundary. However, WRE should revise the assessment to address this apparent error.

Please submit a revised assessment and other documentation to address the remaining violations within 30 days of the date of this letter.

If you should have any questions, please feel free to contact me at (330) 963-1214.

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Materials and Waste Management

KG/cl
Enclosure

ec: Frank Popotnik, DMWM, NEDO Jeremy Carroll, DMWM, CO
Jeff Mayhugh, DMWM, CO Sherry Slone, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO

cc: Larry D. Long, Environmental Coordinator, WRE/ColorTech
Marlene Kinney, DMWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.