



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 1, 2007

**RE: WESTERN ROTO ENGRAVERS, INC.
LARGE QUANTITY GENERATOR
OHD 981960958
MEDINA COUNTY
PARTIAL RETURN TO COMPLIANCE**

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

Dear Mr. Ellebruch:

I received your response to my November 30, 2006 Notice of Violation (NOV) letter on January 3, 2007. The documentation you submitted included photographs, waste manifests, training information, written procedures, written assessment of two hazardous waste storage tanks, waste profiles, and a weekly inspection log.

My review of this documentation reveals that WRE has adequately demonstrated abatement of the following violations discovered during the October 2, 2006 inspection (The violation numbers correspond to those used in my NOV):

1. **Satellite Accumulation Area Requirements**
Containers closed in good condition and compatible with wastes stored in them .
[OAC 3745-52-34(C)(1)(a)]
2. **Satellite Accumulation Area Requirements**
Containers marked with words "Hazardous waste" or other words identifying the contents.
[OAC 3745-52-34(C)(1)(b)]
3. **Immediate access to communication device when handling hazardous waste.**
[OAC 3745-65-34(A)]
6. **Universal Waste Closed Container**
[OAC 3745-273-13(D)(1)]
7. **Waste Evaluation**
[OAC 3745-52-11]

I requested the engineering section in our central office review the assessment you submitted for your two hazardous waste tanks. They identified deficiencies in the assessment, so you will remain in violation of the following rules until the deficiencies have been adequately addressed. A copy of the tank checklist they completed is enclosed.

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

The 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 judgements 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.

**5. 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 (violations #4, #5 and #8).

Our engineering section review also found deficiencies related to secondary containment resulting in the following additional violation.

**8. 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.

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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.

Comments/Questions from the November 30, 2006 NOV letter have been addressed in your January 3, 2007 response.

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

Sincerely,



Kim Gallagher
Environmental Specialist
Division of Hazardous Waste Management

KG:cl
Enclosure

cc: Frank Popotnik, DHWM, NEDO
Sherry Slone, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Jeremy Carroll, DHWM, CO
Larry Long, WRE/ColorTech

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.