



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: M.A. Harrison Mfg. Co., Inc.
OHD 986 988 954
Hazardous Waste
Erie County
Return to Compliance

August 19, 2008

Mr. Walter Denham
M.A. Harrison Mfg. Co., Inc.
14307 Route 113
Birmingham, Ohio 44816

Dear Mr. Denham:

Thank you for your responses to Ohio EPA's February 7, 2008, Notice of Violation letter (NOV). You submitted the following information on the following dates:

- On March 6, 2008, I received a letter (dated March 4, 2008) stating that you will be managing your waste coolant as used oil and all containers storing used oil will be properly labeled "Used Oil".
- On August 7, 2008, I received via email a response stating that M.A. Harrison will now be utilizing cloth towels instead of paper towels and will be laundering them on-site and processing the discharge through your own onsite waste water treatment system, thus M.A. Harrison has implemented a pollution prevention opportunity. Please note, as long as your used rags are laundered and subject to regulation under the Clean Water Act, they are not considered a waste in OAC rule 3745-51-02 and hence not subject to the hazardous waste regulations. In addition, you stated that based on a recommendation from Rick Zuzik, Ohio EPA, Division of Surface Water, M.A. Harrison will launder the rags on a six month trial period to ensure that your system can handle this additional discharge. Please let me know if you modify or change your course of action pertaining to your cloth towels based on this trial period or for any other reason.

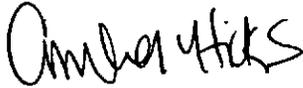
My review of this documentation reveals that M.A. Harrison has adequately demonstrated abatement of all violations discovered during the February 1, 2007, and April 12, 2007, compliance evaluation inspection (CEI) as outlined below:

Violation	Date Violation Observed	Date Violation Abated
1. OAC Rule 3745-52-11, Waste Evaluation.	April 12, 2007	August 7, 2008
2. OAC Rule 3745-52-34 (C) (1) (a), Container Management.	February 1, 2007	February 1, 2007

Violation	Date Violation Observed	Date Violation Abated
3. OAC Rule 3745-52-34 (C) (1) (b), Hazardous Waste labels.	February 1, 2007	February 1, 2007
4. OAC 3745-52-34 (D) (5) (c), Personnel Training.	February 1, 2007	February 1, 2008
5. OAC 3745-279-22 (C) (1) Used oil storage requirements -proper labels.	April 12, 2007	March 6, 2008

No response to this letter is necessary. If you should have any questions, please feel free to call me at (419) 373-3082.

Sincerely,



Amber M. Hicks
Division of Hazardous Waste Management

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pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
(DHWM, NWDO File: M.A. Harrison Mfg. Co., Inc.)
ec: Amber Hicks, DHWM, NWDO

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.