



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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

August 24, 2007

**TUSCARAWAS COUNTY
SIMONDS INDUSTRIES, INC.
DHWM/SEDO
OHD 018 221 853**

Mr. David P. Witman, Esquire
Simonds International
P.O. Box 500
Fitchburg, MA 01420

Dear Mr. Witman:

On August 13, 2007, I conducted a site visit at the Simonds Industries facility in Newcomerstown Ohio. As you know, the Simonds Industries Newcomerstown facility is in the process of closing the facility and going through the Cessation of Regulated Operations process.

During my site visit, I observed the following violations of Ohio's hazardous waste law. In order to correct these violations, you must do the following and send me the required information **within 30 days** of your receipt of this letter:

1. **Hazardous waste determination, OAC rule 3745-52-11:** Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste.

During the site visit, I observed in the Hardening Area, workers sweeping materials into trenches in the floor. In previous inspections at the facility, floor sweepings in this area were handled as hazardous waste. This was confirmed during a phone conversation with Mr. Wayne Miller, an employee with Simonds on August 17, 2007. The floor sweepings from the Hardening Area that were placed in trenches must be removed and a waste evaluation must be made. In addition, in other areas of the facility, brick, metal pipes, oily floor sweepings and trash were observed in pits/trenches. These waste materials must be removed. Only clean hard fill can be used to fill these pits/trenches. A fact sheet is attached for your information. Simonds must perform a waste evaluation on any waste materials that are generated during the CRO process. To demonstrate compliance with this rule, Simonds must submit analytical data for the floor sweepings placed in the trenches in the Hardening Area to Ohio EPA for review.

2. **Used oil storage requirements for generators, OAC rule 375-279-22(D)**: Upon detection of a release of used oil to the environment a generator shall clean up and manage properly the release used oil and other materials.

During the site visit, used oil contaminated soils were observed around leaking scraped machinery in the area in front of the Drop Forge building. As required by this rule, Simonds must clean-up the contaminated soils. To demonstrate compliance with this rule, photographic documentation must be submitted to Ohio EPA demonstrating that the contaminated soil has been removed and disposed of properly.

If you have any questions regarding this letter, please call me at (740) 380-5256.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/dh

Enclosures

cc: Todd Anderson, Ohio EPA, CO, Legal
Harry Sarvis, Ohio EPA, DHWM, CO

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 appropriate regulations.