



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

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

January 30, 2008

**RE: Delphi Packard Electric Systems  
Plant 8  
OHD 981 777 451 and  
Dana Street  
OHD 018 414 292  
Trumbull County  
CRO**

Mr. John Martin  
Delphi Packard Electric Systems  
P.O. Box 431  
Mail Station 10B  
Warren, Ohio 44486

Dear Mr. Martin:

On January 17, 2008, Ohio EPA conducted an inspection of both the Delphi Packard Electric System's Plant 8 and Dana Street facilities located in Warren, Ohio to determine Delphi's compliance with Ohio's Cessation of Regulated Operations (CRO) laws and rules as found under Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). Terry Moyer, Marty Cristo and you represented Delphi. Bill Lutz and I represented Ohio EPA.

Although Ohio EPA noted the following violation of Ohio's CRO laws and regulations (see below), no further action is required by the facility.

1. Duties of Owner/Operator within 90 Days of Cessation, ORC § 3752.06:

Not later than 90 days after cessation of all regulated operations, the facility shall submit to the director a written certification concerning the completion of the removal action. This notification is to contain all the details as outlined in ORC § 3752.06.

Delphi failed to submit the form within 90 days of cessation of regulated operations. However, the form was received by Ohio EPA's Northeast District Office on January 30, 2008. No further action is required.

Mr. John Martin  
Delphi Packard Electric Systems  
January 30, 2008  
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I have enclosed a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at (330) 963-1159.

Sincerely,



Karen L. Nesbit  
Division of Hazardous Waste Management

KLN:cl  
Enclosure

ec: Frank Popotnik, DHWM, NEDO

cc: Trumbull County LEPC  
City of Warren Fire Department  
Ralph McGinnis, DHWM, CO, (w/attachment)

**CESSATION OF REGULATED OPERATIONS CHECKLIST**

<input checked="" type="checkbox"/> Permanent Cessation	<input type="checkbox"/> Temporary Discontinuation	<input type="checkbox"/> Requesting Waiver for Temporary Discontinuation
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Company: DELPHI PACKARD ELECTRIC SYSTEMS -DANA ST EPA ID#: OH0 018 414 292  
 Street: 408 DANA ST City: WARREN  
 County: TRUMBULL State: Ohio Zip: 44483

Mailing Address: P.O. BOX 431 Mail Station 10B Warren OH 44486  
 (If different from above)

Telephone Number: 330 373-2521 Fax Number: \_\_\_\_\_

Owner/Operator: DELPHI CORP

Street: 5725 DELPHI DR City: TROY

County: \_\_\_\_\_ State: MI Zip: 48098-2815

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Contact Person: JOHN MARTIN

Street: P.O. BOX 431 MAIL STATION 10B City: WARREN

County: TRUMBULL State: OH Zip: 44486

Telephone Number: 330 373-2521 Fax Number: \_\_\_\_\_

If the following applies, check the appropriate box and provide information:

<input type="checkbox"/> Holder of First Mortgage	<input type="checkbox"/> Fiduciary	<input type="checkbox"/> Receiver	<input type="checkbox"/> Indenture Trustee
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Name : \_\_\_\_\_

Street: \_\_\_\_\_ City: \_\_\_\_\_

County: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Inspection Date(s): 17 JAN 2008 Time(s): 9:30

Inspection Announced:  YES  NO If so, how much advance notice given?: \_\_\_\_\_

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone Number</u>
Inspectors:	<u>KAREN NESBIT</u>	<u>OHIO EPA</u>	<u>(330) 963-1159</u>
	<u>BILL LUTZ</u>		<u>(330) 963-1200</u>
Facility Rep(s)	<u>JOHN MARTIN</u>	<u>DELPHI</u>	<u>330 373-2521</u>
	<u>TERRY MOYER</u>	<u>DELPHI</u>	

**30-DAY REQUIREMENTS**

- 1. Did the owner/operator of the reporting facility submit a notice of the cessation of all regulated operations (CRO) on a form prescribed by the Director to the following within 30 days of CRO? [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a) ]
  - a. Director of Ohio EPA Yes  No  N/A  RMK# \_\_\_\_\_
  - b. Local Emergency Planning Committee Yes  No  N/A  RMK# \_\_\_\_\_
  - c. Local Fire Department Yes  No  N/A  RMK# \_\_\_\_\_
- 2. Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c) ] Yes  No  N/A  RMK# \_\_\_\_\_
- 3. Did the owner/operator include the following information about the contact person? [ORC §3752.05(B) and OAC rule 3745-352-35(B)] Yes  No  N/A  RMK# \_\_\_\_\_
  - a. Address of principal office of the owner/operator. Yes  No  N/A  RMK# \_\_\_\_\_
  - b. Business or residence address. Yes  No  N/A  RMK# \_\_\_\_\_
  - c. Telephone number of contact person. Yes  No  N/A  RMK# \_\_\_\_\_
- 4. Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)] Yes  No  N/A  RMK# \_\_\_\_\_
- 5. If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)] Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE:** The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See pp 5-6 of this checklist.

**REMARKS**

**90-DAY REQUIREMENTS [ORC §3752.06]**

1. Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)]
- Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE:** The owner/operator may receive approval from the Director to extend the 90-day period. [ORC §3752.06(B) and OAC rule 3745-352-20(A)(3)]

2. Does the owner/operator hold a **valid** hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(g)]
- Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE:** If so, the owner/operator is not subject to CRO for its hazardous waste and must instead comply with the hazardous waste requirements.

3. Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)]
- Yes  No  N/A  RMK# \_\_\_\_\_

4. Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)]
- Yes  No  N/A  RMK# \_\_\_\_\_

5. Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(c)]
- Yes  No  N/A  RMK# \_\_\_\_\_

6. Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d)]
- Yes  No  N/A  RMK# \_\_\_\_\_

7. Did the owner/operator do the following?

a. Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_

OR

b. Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_\_\_

OR

c. Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_

8. Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_

9. Did the owner/operator do the following:

a. Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_  
*- returned per lease*

OR

b. Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_

OR

c. Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_\_\_

**REMARKS**

**SECURITY & WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]**

1. Did the owner/operator secure the facility against unauthorized entry using one or more of the following as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?
- a. Boarded, locked or used other means to secure all windows, doors and other potential means of entry? Yes  No  N/A  RMK# \_\_\_\_\_
  - b. Fencing? Yes  No  N/A  RMK# \_\_\_\_\_
  - c. Lighting and a surveillance system? Yes  No  N/A  RMK# \_\_\_\_\_
  - d. Guard or security service? Yes  No  N/A  RMK# \_\_\_\_\_
  - e. Notarized statement from the county sheriff's department or the local police stating that the security measures secure against unauthorized entry? Yes  No  N/A  RMK# \_\_\_\_\_
  - f. Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry? Yes  No  N/A  RMK# \_\_\_\_\_
2. Did the owner/operator post the appropriate warning signs in the following fashion within 30 days of CRO? [ORC §3752.07(A) and OAC rule 3745-352-20(A)(1)(b)]:
- a. Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] Yes  No  N/A  RMK# \_\_\_\_\_
  - b. Are warning signs posted on, or reasonable proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)] Yes  No  N/A  RMK# \_\_\_\_\_
  - c. Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)] Yes  No  N/A  RMK# \_\_\_\_\_
  - d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)] Yes  No  N/A  RMK# \_\_\_\_\_
  - e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)] Yes  No  N/A  RMK# \_\_\_\_\_

3. Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]

a. Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)]

Yes  No  N/A  RMK# \_\_\_\_\_

b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)]

Yes  No  N/A  RMK# \_\_\_\_\_

c. Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)]

Yes  No  N/A  RMK# \_\_\_\_\_

**REMARKS**

**ADDITIONAL MULTI-MEDIA QUESTIONS**

If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply.

- 1. If the facility has an U.S. EPA I.D. number, has the facility submitted a *Notification of Regulated Waste Activity* form? Yes\_\_\_ No<sup>1</sup>
  
- 2. Were there any <90 day accumulation units for hazardous waste? Yes\_\_\_ No\_\_\_  
List where unit(s) were/are: \_\_\_\_\_  
not applicable
  
- 3. Did the owner/operator close his facility in a manner that: [OAC 3745-66-11]
  - a. Minimizes the need for further maintenance? Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_
  - b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_
  - c. Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04? Yes\_\_\_ No<sup>2</sup>\_\_\_ N/A  RMK#\_\_\_
  
- 4. During the partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10? Yes\_\_\_ No<sup>2</sup>\_\_\_ N/A  RMK#\_\_\_
  - a. Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code? Yes\_\_\_ No\_\_\_ N/A  RMK#\_\_\_

Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos>.

5. Will any buildings be demolished? If yes: Yes \_\_\_ No \_\_\_  
 Has a *Notification of Demolition and Renovation* form been submitted? Yes<sup>3</sup> \_\_\_ No<sup>4</sup> \_\_\_
6. Are there any wells on the property? Yes<sup>5</sup> ✓ No \_\_\_

If yes, where are the wells?

~ 6-9 on both properties + administration bldg

What are the wells used for?

- remediation investigation

7. Is there open dumping of solid waste on the property? Yes<sup>6</sup> \_\_\_ No ✓

**REMARKS**

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1. In lieu of the facility now submitting a form, the inspector should submit a copy of the final CRO letter to Central Office's Regulatory and Information Services for I.D. deactivation.
  2. Supply the facility with the requirements for generator closure and tell them they must close the unit and have documentation that closure was completed (LQGs only).
  3. Check with the appropriate agency to determine if a form has been received.
  4. Supply the facility with a form and contact the appropriate agency stating that demolition will occur.
  5. If used for drinking water, let DDAGW know about the well.
  6. Let DSIWM know about the open dumping of solid waste.