



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Les Fisher, Lt. Governor  
Chris Korieski, Director

August 20, 2010

Kale Moberg  
State Industrial Products  
333 N. High St.  
Hebron, OH 43025

**RE: STATE INDUSTRIAL PRODUCTS, OHD004520987, CUYAHOGA COUNTY  
CESSATION OF REGULATED OPERATIONS**

Dear Mr. Moberg:

On August 10, 2010, Ohio EPA, represented by Edward D'Amato and Frank Popotnik, conducted a Cessation of Regulated Operations (CRO) inspection at State Industrial Products located at 3100 Hamilton Avenue in Cleveland which ceased regulated operations on May 6, 2010.

You explained that the only portion of the facility that will be closing is the manufacturing section on the west end of the building, which is currently owned by the State of Ohio. A call center, sales, other office functions, building maintenance and product warehousing will continue in the remainder of the building. Manufacturing operations were transferred to State Industrial Products' Hebron, Ohio facility. The closing process began in late 2009/early 2010.

You also explained that the former less-than-90-day hazardous waste accumulation area, which is located in a part of the facility that will remain open, will not be closed. It is State Industrial Products' intent to continue to use the accumulation area for any wastes that are generated through maintenance of the still active portion of the building.

The inspection included a walkthrough of the manufacturing portion of the facility, an inspection of the CRO signs posted on the building, and a review of the weekly inspection log.

State Industrial Products must do the following before Ohio EPA will approve CRO:

1. Submit a list of all regulated materials that have been transferred or sold since the closing process began.
2. Submit copies of all disposal manifests for hazardous and non-hazardous wastes that have been generated since the closing process began.

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3. Submit a list of any equipment containing regulated substances that remain in the building and when they will be sold, disposed or transferred.
4. There were some containers of regulated materials remaining in the closed portion of the facility. You explained that State Industrial Products is in the process of evaluating the materials for disposal. These materials must be moved to the active portion of the facility.

Failure to list specific deficiencies or violations in this communication does not relieve State Industrial Products from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

cc: Ralph McGinnis, DHWM, CO  
ec: Frank Popotnik, DHWM, NEDO