



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 16, 2011

**RE: CORNWELL QUALITY TOOL
OHD 039 454 798
SUMMIT COUNTY
SQG PRTC**

CERTIFIED MAIL

Mr. Brian Leon
Human Resource Manager
Cornwell Quality Tools Co.
200 North Cleveland Avenue
Mogadore, Ohio 44260-1205

Dear Mr. Leon:

On March 11, 2011, Ohio EPA received Cornwell Quality Tools Company's response to the Ohio EPA notice of violation (NOV) letter dated February 10, 2011 based on the January 21, 2011 compliance evaluation inspection. This response included the following:

1. Attachment A – Weekly accumulation inspections and emergency equipment inspections from January 24 through February 28, 2011.
2. Attachment B – Memo signed by Maintenance staff documenting they have been trained in proper universal waste management procedures.
3. Safety Kleen documentation demonstrating that Cornwell will continue to use the parts washer, but the waste from it will be in the Safety Kleen continuous use program (CUP) and is therefore not a hazardous waste.

In addition, Ohio EPA received the following:

1. E-mail dated February 10, 2011 including the analytical results for the tank bottoms.
2. E-mail dated February 11, 2011 of corrected analytical results.
3. E-mail dated February 22, 2011 with supporting documentation for corrected analytical results.
4. E-mail dated February 22, 2011 with Envirite information regarding wastewater treatment sludge.
5. E-mail dated March 4, 2011 with plating sludge results.
6. E-mail dated March 14, 2011 clarifying that the F006 waste water sludge will be managed in gaylords and shipped every 180 days.

The following violations were returned to compliance in the February 10, 2011 NOV and needed no further action:

3. ***Labeling Requirements for Hazardous Waste Containers, OAC rule 3745-52-34(A) (2).***
4. ***[Satellite] Accumulation Area Requirements, OAC rule 3745-52-34(C)(1)(b).***
5. ***Requirements for Hazardous Waste Containers, OAC rule 3745-66-73(A).***
8. ***Labeling/marketing- standards for small quantity handlers of universal waste, OAC rule 3745-273-14(E).***
9. ***Packaging of Universal Waste Lamps, OAC rule 3745-273-13(D)(1).***
12. ***Used Oil Storage Requirements for Generators, OAC rule 3745-279-22(C).***

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Based on the above noted submittals, Cornwell has abated the following violations:

2. **Waste Evaluation, OAC rule 3745-52-11** (Note, the wastes in question were determined to be non hazardous).
6. **Weekly Inspections, OAC rule 3745-66-74.**
7. **Testing and Maintenance of Equipment, OAC rule 3745-65-33.**
11. **Employee training for Small Quantity Handlers of Universal Waste, OAC rule 3745-273-16.**

Regarding the final violation, **Establishing and operating a hazardous waste facility without a permit and storing hazardous waste without a permit, Ohio Revised Code (ORC) § 3734.02 (E) and (F)**, Ohio EPA notified you in correspondence dated February 10, 2011, that the nature of this violation made this hazardous waste storage area subject to closure as described in OAC rules 3745-55-11 through 3745-55-20 and OAC rule 3745-55-42 through 3745-55-47. However, Ohio EPA is not requiring any further action at this time to abate this violation.

Finally, Ohio EPA noted one concern regarding the Safety Kleen parts washer in the maintenance area. Based on your response, Cornwell is going to continue to use the unit and Safety Kleen will be managing the waste as part of their Continuous Use Program. Please note, per the information you sent in the March 14, 2011 letter, Safety Kleen has indicated that Cornwell is a conditionally exempt small quantity generator of hazardous waste (generating between 0-220 pounds of hazardous waste per month). Cornwell is a small quantity generator. Please notify Safety Kleen of this correction.

Should you have any questions or require additional information, please contact Frank Popotnik, my supervisor, or me at (330) 963-1200.

Sincerely,



Karen L. Nesbit
Division of Hazardous Waste Management

KLN.cl

ec: Harry Sarvis, DHWM, CO
Mitch Mathews, DHWM, CO
Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.