



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Central District Office

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P.O. Box 1049  
Columbus, OH 43216-1049

February 6, 2009

Mr. David Rinehart  
Diebold, Incorporated  
5995 Mayfair Road  
North Canton, OH 44720

**Re: Diebold Midwest Manufacturing, Inc  
CRO (OHD981778269)  
Licking County**

Dear Mr. Rinehart:

On October 9, 2008 Ohio EPA received a notification of cessation of regulated operations for the Diebold Midwest Manufacturing facility at 1050 O'Neil Drive in Hebron, Ohio (effective as of October 2, 2008). A final certification of completion of CRO activities was then received by Ohio EPA on December 23, 2008. On January 22 and 23, 2009 I conducted verification inspections with you at the facility. An amended Section 2.3 of the final certification form dated January 22, 2009 was also received during my January 23 inspection visit.

At this time, the following violations were identified during my review but have each been resolved:

- 1.) **Removal of debris, containers, furnishings, and non-stationary equipment that contain or are contaminated with a regulated substance, ORC 3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(d):** The Owner/operator must remove such items by transferring them to another facility under their ownership, or to another person through sale or otherwise; or by causing them to be transported offsite in compliance with applicable and appropriate waste management laws.

The following items were remaining on site at the time of the 1/22/09 inspection, but had been properly removed as of the second visit on 1/23/09:

- A fluorescent light fixture with an 8-foot fluorescent tube, on a storage rack
- A cart of electronic equipment, Six pallets of PCs, CRT monitors, and other electronic gear for recycling
- Several copy machines, blueprint machines (dry process) and a shredder
- Contents of a corner office that included a computer and monitor
- A 5-gallon can of gasoline

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

- A 55-gallon drum of condensate water and oil from the air compressors
- A 30-gallon red steel drum of Safety Kleen premium naphtha solvent
- Approximately 9 fluorescent light fixtures and several lamp tubes, and 3 full boxes of lamp tubes, plus 4 large lighting fixtures on a storage rack
- A deep-cycle marine lead-acid battery
- A tall compressed gas cylinder with Argon and CO2, beside door M-3

A rack of propane tanks and a propane powered tow-motor unit noted at the facility on January 23<sup>rd</sup> were transferred to the nearby Milliken Drive facility (also owned by Diebold) according to your email message to me dated January 26, 2009. The tow motor and an electric lift truck will be operated under the control of personnel from the Milliken Drive facility, and moved permanently to that location once the racking in the O'Neil Drive facility is taken down.

- 2.) **List of stationary tank, transformers or vessels containing regulated substances that is to remain at the facility, ORC 3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(c):** The owner/operator must submit a list of every such stationary item that is to remain.

The certification dated 12/19/08 omitted the transformers, air compressor units with oil, computer servers, and natural gas powered generator with attached lead-acid battery, but this information was added to the amended certification signed by Mr. George Myers on behalf of Diebold, on 1/22/09.

At this time, the obligations for completion of final cessation of regulated operations at the Diebold Midwest Manufacturing, Inc. facility at 1050 O'Neil Drive in Hebron, Ohio do appear to have been properly completed. Ohio EPA will also now be deactivating the hazardous waste generator identification number that was previously issued to this facility address.

If you have any questions regarding this letter, feel free to contact me at (614) 728-3885.

Sincerely,



J. David Hohmann  
Environmental Specialist  
Division of Hazardous Waste Management  
Central District Office

c: Ralph McGinnis  
CDO File  
Kristina Durnell

**CESSATION OF REGULATED OPERATIONS CHECKLIST**

<input checked="" type="checkbox"/>	Permanent Cessation	<input type="checkbox"/>	Temporary Discontinuation	<input type="checkbox"/>	Requesting Waiver for Temporary Discontinuation		
<b>COMPANY:</b>							
Name:	Diebold Midwest Manufacturing			EPA ID#:	OHD981778269		
Street:	1050 O'Neil Drive			City:	Hebron		
County:	Licking	State:	Ohio	Zip:	43023		
Telephone Number:	(330)490-6867		Fax Number:				
<b>OWNER/OPERATOR:</b>							
Name:	Diebold, Incorporated						
Street:	5995 Mayfair Rd.			City:	North Canton		
County:		State:	OH	Zip:	44720		
Telephone Number:	614-875-7912		Fax Number:				
<b>CONTACT PERSON OR PRINCIPAL OFFICE INFORMATION</b>							
Name:	David Rinehart						
Street:	Same as owner/operator address			City:	North Canton		
County:		State:	OH	Zip:			
Telephone Number:	(330) 490-6867		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"/>	Indentured Trustee
Name:							
Street:				City:			
County:		State:		Zip:			
Telephone Number:			Fax Number:				
				Affiliation			
<b>INSPECTION INFORMATION</b>							
	<b>NAME</b>		<b>AFFILIATION</b>		<b>PHONE NUMBER</b>		
Inspectors:	David Hohmann		Ohio EPA CDO- DHWM		614-728-3885		
Inspection Dates:	1/22/2009 and 1/23/2009			Time(s):	1130-1230 (first visit) 1100-1145 (second visit)		
Inspection Announced?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	If so, how much advance notice given?		3 days		
Facility: Rep(s)	David Rinehart						

### 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Local Emergency Planning Committee?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Local Fire Department?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Address of principal office of the owner/operator?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Business or residence address?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Telephone number of contact person?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

6.	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)(g)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**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)]

7.	Does the owner/operator hold a <b>valid</b> 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)(h)] <b>RMK: An ID number was issued in 1986; facility operated in recent years as CESQG.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	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)(c)]  <i>RMK: The certification dated 12/9/08 indicated none remained on site, but three oil-filled transformers, computer server equipment, and a generator with lead-acid battery identified during the walkthrough on 1/22/09 (to remain in service) were added to an updated certification dated 1/23/09.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  <i>This violation was corrected at the time of the inspection revisit on 1/23/09.</i>

11.	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)(d)]  <i>RMK: See item 10 above. An oil/water separator tank was found to contain about 30 gallons of fluid and it was emptied prior to my revisit on 1/23/09.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  <i>This violation was corrected at the time of the inspection revisit on 1/23/09.</i>
12.	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)(d)(i)] <i>RMK: They were sent to Tosoh's Grove City, OH facility.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)(d)(ii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)(d)(iii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	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)(d)] <i>RMK: The following items were found remaining on site at the time of the 1/22/09 inspection, but had been removed as of the second visit on 1/23/09:</i> <ul style="list-style-type: none"> <li>• A fluorescent light fixture on a storage rack, with an 8-foot fluorescent tube in it.</li> <li>• A cart of electronic equipment for recycling</li> <li>• Six pallets of PCs, CRT monitors, and other electronic gear</li> <li>• Several copy machines, blueprint machines (dry process) and a shredder.</li> <li>• Contents of a corner office that included a computer and monitor</li> <li>• A 5-gallon can of gasoline</li> <li>• A 55-gallon drum of condensate water and oil from the air compressor system</li> <li>• A 30-gallon red steel drum of Safety Kleen premium naphtha solvent.</li> <li>• Approximately 9 fluorescent light fixtures and several lamp tubes, and 3 full boxes of lamp tubes, plus 4 large lighting fixtures on a storage rack.</li> <li>• A deep-cycle marine lead-acid battery</li> <li>• A tall compressed gas cylinder with Argon and CO2, beside door M-3</li> </ul>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  <i>This violation was corrected at the time of the inspection revisit on 1/23/09.</i>
14.	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)(d)(i)].	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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)(d)(ii)].	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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)(d)(iii)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>SECURITY &amp; WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]</b>		
15.	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?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Boarded, locked or used other means to secure all windows, doors and other potential means of entry?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Fencing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Lighting and a surveillance system?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Guard or security service?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Other measures demonstrated to the satisfaction of the Director or his/her designee to secure against unauthorized entry?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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16.	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(B)]:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)] RMK: <i>not applicable anymore since removal process is completed.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)] RMK: <i>not applicable anymore since removal process is completed.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>ADDITIONAL MULTI-MEDIA QUESTIONS</b>		
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.		
18.	If the facility has an U.S. EPA I.D. number, has the facility submitted a Notification of Regulated Waste Activity form? <i>RMK: Many years ago. The generator ID number will be deactivated administratively at this time.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	Were there any <90 day accumulation units for hazardous waste?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>List Where Unit(s) Were/Are:</b> N/A. <i>RMK: Facility operated as a CESQG for the last 10-15 years.</i>		
20.	Did the owner/operator close his facility in a manner that: [OAC 3745-66-11] [N/A, along with Question 21]	
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 <a href="http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos">http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos</a> .		
22.	Will any buildings be demolished? If yes: [N/A]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
23.	Are there any wells on the property?	Yes <sup>5</sup> <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
24.	Is there open dumping of solid waste on the property?	Yes <sup>6</sup> <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	<ol style="list-style-type: none"> <li>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.</li> <li>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).</li> <li>Check with the appropriate agency to determine if a form has been received.</li> <li>Supply the facility with a form and contact the appropriate agency stating that demolition will occur.</li> <li>If used for drinking water, let DDAGW know about the well.</li> <li>Let DSIWM know about the open dumping of solid waste.</li> </ol>	