

Environmental
Protection Agency

Governor
Lt. Governor
Director

January 20, 2012

RE: THE CREST RUBBER COMPANY
OHD004213740
COMPLAINT #7478
PORTAGE COUNTY
PARTIAL RETURN TO COMPLIANCE

David H. Clark
The Crest Rubber Company
6408 Newton Falls Road
Ravenna, OH 44266

Dear Mr. Clark:

On January 17, 2012 I received your response to my December 14, 2011 notice of violation letter. Your response included a copy of the receipt documenting that 5 drums of used oil were removed from Crest Rubber, and pictures showing that drums of used oil are labeled, the used fluorescent bulbs are in labeled, cardboard containers, and the former burn area has been seeded and covered with straw.

Crest Rubber has returned to compliance with these violations. The numbering in this letter corresponds to the December 14, 2011 notice of violation:

1. **Ohio Administrative Code (OAC) 3745-19-03(A); Open Burning.**

And;

3. **OAC 3745-273-13(D)(2); Universal waste lamp management standards. Spent lamps must be stored in containers or packages (boxes) that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.**

This violation was abated at the time of the inspection:

4. **OAC 3745-279-22(C)(1); Containers and above ground tanks that are used to store used oil must be labeled with the words, "Used Oil".**

The following violation remains unaddressed:

2. **Ohio Administrative Code (OAC) 3745-52-11; Hazardous Waste Determination. This rule requires that any person who generates a waste must determine if that waste is a hazardous waste.**

THE CREST RUBBER COMPANY
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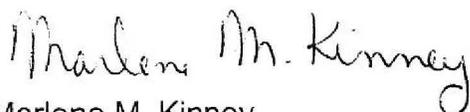
Crest has failed to evaluate its spent blasting sand to determine if it is a non-hazardous or hazardous waste for disposal purposes. The material should be tested to determine if there are elevated levels of metals in the spent blasting sand. You will want to have an environmental lab run TCLP metals on a representative sample of the spent blasting sand. If the material is determined to be a hazardous waste, you will not be able to dispose of it in the trash and will have to send it off-site to a permitted hazardous waste facility.

To abate this violation, please send the test results to me.

Please respond within 30 days of the date on this letter with the requested analysis.

Should you have any questions, please feel free to call me at (330) 963-1162 or email me at marlene.kinney@epa.state.oh.us

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Materials and Waste Management

MMK:ddw

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO