Ohio | Environmental Protection Agency

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

Re: Hale Performance Coatings
(fka Hale Chrome Services)
OHD 987 023 934
Lucas County
Return to Compliance

December 5, 2011

Mr. Dean Spradlin
Hale Performance Coatings
2282 Albion Street
Toledo, Ohio 43606

Dear Mr. Spradlin:

Thank you for your November 15, 2011, and November 18, 2011, responses to Ohio EPA's November 9, 2011, Notice of Violation (NOV) letter. Hale Performance Coatings (hereafter referenced as HPC) submitted information for annual hazardous waste refresher training. My review of the documentation submitted reveals that HPC has adequately demonstrated abatement of the violation cited in the November 9, 2011, NOV.

The following is a summary of the violation cited in the November 9, 2011, NOV as a result of my October 19, 2011, inspection and your compliance with respect to it:

1. **OAC Rule 3745-54-16(C): Personnel Training:**
A generator shall provide annual refresher training for all personnel involved in the handling and management of hazardous waste at the facility. The Ohio EPA interprets "annual" to mean one time each 365 days.

HPC failed to provide annual refresher training for all personnel involved in the handling and management of hazardous waste at the facility. HPC had at least two employees who were over the one year requirement for annual training. Shane Gibson received annual training on 8/13/09, 9/16/10, and none in 2011. Mike Reese received annual training on 8/11/09, 9/17/10, and none in 2011.

To abate this violation, HPC shall immediately provide annual refresher training for Shane Gibson, Mike Reese, and any other employees who are overdue and shall submit a copy of the training records to Ohio EPA. In addition, HPC must submit a detailed written training policy that ensures all applicable employees receive annual refresher training as required.

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347 North Dunbridge Road
Bowling Green, OH 43402-9398

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419 | 352 8468 (fax)
www.epa.ohio.gov

On November 15, 2011, HPC submitted, via electronic mail, a copy of the training plan that will be used for annual refresher training. In addition, HPC submitted a copy of the sign-in sheet for the four employees that received annual hazardous waste refresher training on November 14, 2011.

On November 18, 2011, HPC submitted, via electronic mail, a copy of the sign-in sheet for the remaining two employees that received annual hazardous waste refresher training on November 18, 2011,

With this information, this violation has been abated.

Should you have any questions or if I can be of assistance, please contact me at (419) 373-3066.

Sincerely,

Melissa L. Boyers

Melissa L. Boyers
Division of Materials and Waste Management

/llr

pc: Cindy Lohrbach, DMWM, NWDO
Colleen Weaver, DMWM, NWDO

ec: Colleen Weaver, DMWM, NWDO (scanned e-copy)
Melissa Boyers, DMWM, NWDO

Notice:
Ohio's EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.