



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

**Re: Mansfield Plumbing Products
LLC
OHD 038 951 554
Ashland County
Return to Compliance**

March 22, 2007

Mr. Dave Shook
Facility Engineering Manager
Mansfield Plumbing Products, LLC
150 East First Street
Perrysville, Ohio 44864

Dear Mr. Shook:

Thank you for your December 14, 2005, response to Ohio EPA's November 9, 2005, Notice of Violation (NOV) letter. With your response, you submitted documentation including written details as to how you will ensure that employees responsible for hazardous waste management will be trained within one year as required by Rule 3745-65-16(C) of the Ohio Administrative Code (OAC) and an updated Contingency Plan that shows you as the primary emergency coordinator.

In addition to the information provided in the December 14, 2005, package, on December 13, 2005, Rahel Babb received a facsimile of a list titled, "Affected Employees handling hazardous waste." In this list, it was stated that the Environmental Manager would be "responsible for providing initial and annual training for all employees handling hazardous waste." As was discussed with you in a phone conversation with Rahel on December 13, 2005, this is an effective demonstration of employee training as required by OAC Rule 3745-65-16(D).

And, on March 13, 2007, Ohio EPA received the analytical results of used oil contaminated materials. This information effectively demonstrates that the used oil contaminated materials generated by Mansfield Plumbing Products are not hazardous.

The review of this documentation reveals that Mansfield Plumbing Products has adequately demonstrated abatement of all violations discovered during Rahel Babb's inspection conducted on November 9, 2005, including:

1. OAC Rule 3745-52-11, Waste Evaluation.

Mr. Dave Shook
March 22, 2007
Page 2

2. OAC Rule 3745-65-16, Personnel Training.
 - a. OAC Rule 3745-65-16 (C), Personnel Training.
 - b. OAC Rule 3745-65-16 (D), Personnel Training.
3. OAC Rule 3745-65-52, Contingency Plan.
 - a. OAC Rule 3745-65-52 (D), Contingency Plan.
 - b. OAC Rule 3745-65-52 (E), Contingency Plan.
4. OAC Rule 3745-279-22 (C) (1), Used Oil Labels.

If you should have any questions, please contact John Pasquarette, DHWM Environmental Manager at (419) 373-3057.

Sincerely,

Kara Reynolds

Kara Reynolds
Division of Hazardous Waste Management

/csi

pc: Colleen Weaver, DHWM, NWDO
Cindy Lohrbach, DHWM, NWDO
DHWM, NWDO Ashland County
File: Mansfield Plumbing
Products 2007

ec: John Pasquarette, DHWM,
NWDO
Ed Merriman, DHWM, NWDO
Kara Reynolds, DHWM, NWDO
Rahel Babb, DSW, NWDO

NOTICE:

Ohio 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.