



**Environmental
Protection Agency**

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

Re: Defiance Precision Products
OHD987024031
Defiance County
Hazardous Waste
Return to Compliance

January 24, 2012

Mr. Wesley Schultz, Operations Manager
GT Technologies
Defiance Operations
1125 Precision Way
Defiance, Ohio 43512

Dear Mr. Schultz:

Thank you for your January 12, 2012, response to Ohio EPA's December 22, 2011, Partial Return to Compliance letter. Defiance Precision Products (DPP) submitted photographic documentation for the used oil collection system. My review of the documentation submitted reveals that DPP has adequately demonstrated abatement of all of the violations cited in the July 6, 2011, Notice of Violation (NOV) letter.

The following is a summary of the violations cited in the July 6, 2011, NOV as a result of my June 15, 2011, inspection and your compliance with respect to each:

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

Any person who generates a waste must determine if that waste is a hazardous waste by using generator knowledge or by testing the waste.

On November 15, 2011, DPP submitted information regarding the future management of the spent fluorescent bulbs. DPP will manage the spent fluorescent bulbs as universal waste and will send them to Veolia Environmental Services. DPP will ensure that the spent fluorescent bulbs are properly recycled.

This violation was previously abated on November 15, 2011.

2. OAC Rule 3745-52-34(C)(1)(a): Container Management:

A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

On November 15, 2011, DPP submitted photographic documentation for the bronze grinding swarf hopper that has been equipped with a cover to keep it closed.

This violation was previously abated on November 15, 2011.

3. OAC Rule 3745-52-34(D)(5)(b): Preparedness and Prevention:

A generator must post the following information next to the telephone: the name and telephone number of the emergency coordinator; location of fire extinguishers and spill control equipment, and if present, fire alarms; and the telephone number of the fire department, unless the facility has a direct alarm.

On November 15, 2011, DPP submitted a copy of the emergency information sheet that is posted next to the phone located nearest the outside hazardous waste storage area. In addition, photographic documentation was submitted showing the information posted on the wall next to the telephone.

This violation was previously abated on November 15, 2011.

4. OAC Rule 3745-52-34(D)(5)(c): Emergency Procedures/Preparedness and Prevention:

A generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

On August 5, 2011, DPP submitted a copy of the training program for review. Ohio EPA reviewed the training program and notified the facility by electronic mail on August 11, 2011, to proceed with training their employees using this plan.

On December 9, 2011, DPP submitted, via electronic mail, a copy of the sign in sheets listing the names of the employees who attended the training on December 7, 2011, and December 8, 2011.

This violation was previously abated on December 9, 2011.

5. OAC Rule 3745-65-33: Emergency Equipment:

All facility communications or alarm systems, spill control equipment and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

On November 15, 2011, DPP submitted a copy of a completed weekly hazardous waste inspection log that lists the testing of the alarms and checking spill control equipment at the facility. The emergency equipment will be tested and maintained during the weekly inspections to assure its proper operation if needed.

This violation was previously abated on November 15, 2011.

6. OAC Rule 3745-66-74: Inspections:

Container storage areas shall be inspected on a weekly basis looking for leaks and for deterioration. These inspections shall be recorded in an inspection log or summary. Ohio EPA interprets weekly to mean once within the seven-day period following the previous inspection.

On November 15, 2011, DPP submitted a copy of five weeks of completed weekly inspection logs (10/5/11, 10/12/11, 10/19/11, 10/26/11, and 11/2/11) for the hazardous waste storage area.

This violation was previously abated on November 15, 2011.

7. OAC Rule 3745-279-22(A): Storage:

Used oil generators must store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit.

DPP allows used oil to drain out of the scrap metal roll-off and on to a sloped concrete loading dock area. The accumulated used oil and rain water is pumped out of this area on a weekly basis. To abate this violation, DPP must immediately begin collecting the used oil that drains out of the scrap metal roll-off bin into a tank or container that is in good condition and not leaking. This tank or container must also be properly labeled "used oil". DPP must submit photographic documentation to show that the used oil from the scrap metal roll-off is now being properly collected in a tank or container.

Following multiple electronic and telephone correspondences, it was agreed upon that DPP would provide secondary containment for the scrap metal bins to catch the used oil that previously was allowed to drain out of the bins and onto the loading dock area. A skid style containment dike that both scrap metal hoppers could sit on has been ordered and DPP is waiting for it to be delivered. Once the skid is in place and properly labeled "used oil", DPP will submit photographic documentation to show that the used oil is properly being collected.

On January 12, 2012, DPP submitted photographic documentation showing the two scrap metal bins now sitting on top of a skid designed to collect and contain any used oil that drain out of them. The new containment skid is also properly labeled "used oil".

With this information, this violation has been abated.

8. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

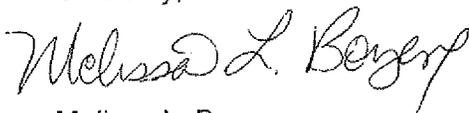
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On November 15, 2011, DPP submitted photographic documentation showing the 4,000-gallon aboveground used oil tank now properly labeled "used oil".

This violation was previously abated on November 15, 2011.

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

Sincerely,



Melissa L. Boyers
Division of Materials and Waste Management

//lr

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.