



**Environmental
Protection Agency**

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

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

December 22, 2011

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

Dear Mr. Schultz:

Thank you for your August 5, 2011; August 17, 2011; October 6, 2011; November 15, 2011; and December 9, 2011, responses to Ohio EPA's July 6, 2011, Notice of Violation (NOV) letter. The documents you submitted included an employee training program along with sign-in sheets, used oil containment options for the loading dock, photographs, weekly inspection logs, and universal waste management plans. My review of the documentation submitted reveals that Defiance Precision Products (DPP) has adequately demonstrated abatement of seven of the eight violations cited in the July 6, 2011, 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.

DPP failed to have adequate waste evaluation documentation for the spent "green tipped" fluorescent bulbs generated at the facility.

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.

With this information, this violation has been abated.

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.

The bronze grinding swarf hopper was not covered. The hopper is located next to the bronze grinding machine which is typically run during one out of the three daily shifts at the facility. This satellite container must be kept closed during the times the grinding machine is not in use and waste is not being added or removed.

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.

With this information, this violation has been abated.

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.

DPP failed to have the required information posted next to the telephone located nearest to the outside hazardous waste storage area.

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.

With this information, this violation has been abated.

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.

DPP failed to properly train employees on proper waste handling and emergency procedures related to the wastes generated on-site.

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.

With this information, this violation has been abated.

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.

DPP does not test and maintain the emergency equipment to assure its proper operation in the event of an emergency. These tests are not recorded in a log. It is recommended that the log include the following information: date and time of test, name of person conducting the test, observations made and date/nature of any repairs.

To abate this violation, DPP must submit a copy of an internal policy regarding the testing and maintenance of all emergency equipment and the frequency of the inspections to Ohio EPA, NWDO. DPP must submit a copy of a completed inspection log to verify compliance with this rule. An example log was given to you at the time of the inspection.

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.

With this information, this violation is considered abated.

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.

DPP was not conducting inspections of the hazardous waste storage area located in the bronze grinding machine area where bronze grinding swarf (D008) and bronze grinding coolant (D008) is stored.

To abate this violation, DPP must immediately begin conducting weekly inspections of the outside hazardous waste storage area and submit four (4) weeks of completed inspection logs to this office. An example log was given to you at the time of the 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.

With this information, this violation is considered abated.

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.

This violation has not been abated and remains outstanding.

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."

DPP had one 4,000-gallon aboveground storage tank that was not properly labeled.

To abate this violation, DPP must submit photographic documentation to show that the 4,000-gallon aboveground storage tank is properly labeled "used oil".

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

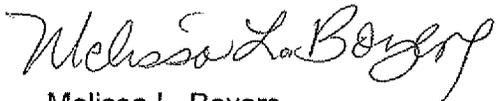
With this information, this violation is considered abated.

Please submit documentation demonstrating abatement of the above outstanding violation (number 7) to this office within **30 days** of receipt of this letter.

Mr. Wesley Schultz
December 22, 2011
Page Five

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

/cs

pc: Cindy Lohrbach, DMWM, NWDO
DMWM - HW, NWDO File

ec: Colleen Weaver, DMWM, NWDO
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.