



State of Ohio Environmental Protection Agency

File  
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**Southwest District Office**

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

February 22, 2007

**Re: Chrome Deposit Corporation  
Large Quantity Generator  
OHD981526676  
Butler County**

Mr. Nick Holden  
Technical / Plant Manager  
Chrome Deposit Corporation  
341 Lawton Avenue  
Monroe, Ohio 45050

Dear Mr. Holden:

On February 15, 2007, Ohio EPA received Chrome Deposit Corporation's February 13, 2007 response to Ohio EPA's January 10, 2007 Notice of Violation (NOV). Chrome Deposit Corporation's response includes an explanation how the contingency plan has been updated, how the personnel training plan was developed and implemented, and how a spill kit has been provided for the 90 day storage area.

My review of this documentation reveals that Chrome Deposit Corporation has adequately demonstrated abatement of each violation cited in Ohio EPA's January 10, 2007 Notice of Violation (NOV).

Within Chrome Deposit Corporation's response you provided the content of the training material which was developed in order to comply with 3745-65-16 (C) personnel training. Based on my review of the material, I found a violation of Ohio's hazardous waste laws and regulations which I am compelled to bring to your attention. In order to abate this violation, Chrome Deposit Corporation must follow Ohio EPA's recommendation and, **within 30 days** of your receipt of this letter, Chrome Deposit Corporation must submit a written response describing how this violation has been abated.

**VIOLATION**

**Personnel Training OAC 3745-65-16 (A)(2)**

This regulation requires that instruction which is provided in order to meet personnel training requirements must include training about contingency plan implementation.

Based upon my review of the content of the personnel training provided, the instruction did not include training about contingency plan implementation. Therefore, Chrome Deposit Corporation is in violation of OAC 3745-65-16 (A)(2) for not providing training relative to the implementation of the contingency plan.

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To abate this violation, provide employees training relative to implementation of the contingency plan. Also, please review all of the personnel training requirements within OAC 3745-65-16 to ensure the training program will meet all the requirements of the rule. Provide a written response to this letter explaining how Chrome Deposit Corporation has addressed this concern. The rule pertaining to personnel training and all other hazardous waste rules can be found at <http://www.epa.state.oh.us/dhwm/rules.htm>.

Based on my review of Chrome Deposit Corporation's response, I also found the following general concern. Chrome Deposit Corporation should follow Ohio EPA's recommendation to address this concern. **Within 30 days** of receipt of this letter, Chrome Deposit Corporation must submit a written response describing how this concern has been addressed:

OAC 3745-65-16 (D)(4) requires that a facility keep records that document personnel training has been provided to employees and has been completed. To demonstrate compliance with this requirement, Chrome Deposit Corporation should submit to this office a record which documents the type of training, the date of training and the attendees, such as an attendance sheet from the training session. Also in the future you should retain this type of record to demonstrate compliance with this rule.

If you have any questions about the rules or how to respond to this letter, please feel free to contact me at (937)285-6082. 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.

Sincerely,



Brian Gitzinger  
District Representative  
Division of Hazardous Waste Management

cc: Dinah Crawford, DHWM, SWDO

BG/br