



State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

October 1, 2007

Mr. Dan Combs  
Continuous Link Color Inc.  
4820 Industry Drive  
Fairfield, OH 45014

47417

**Re: Notice of Violation, Continuous Link Color Inc.; Butler County; CRO**

Dear Mr. Combs:

On September 27, 2007 you informed me in a telephone conversation that Continuous Link Color has yet to remove all regulated substances from its facility at 4820 Industry Drive, Fairfield, Ohio. Based upon this information, we have found Continuous Link Color is in violation of the following Cessation of Regulated Operations (CRO) law.

- (1) **OAC 3745-352-20(A)(2), What are my responsibilities if I am an owner or operator?** Within 90 days of ceasing regulated operations, you must submit a copy of the most recent chemical inventory form submitted to the State Emergency Response Commission in accordance with ORC §3750.08, including a statement indicating whether any asbestos-containing materials are present at the facility. You must also submit a copy of the most current hazardous chemical list (or MSDSs) that you are required to have on file with the State Emergency Response Commission under ORC §3750.07. You must also submit a list and location of every stationary item on site that contains or is contaminated with a regulated substance, including an identification of the regulated substance in each. You must also legally remove from the facility all regulated substances and all debris, nonstationary equipment and furnishings, nonstationary containers, and motor vehicles and rolling stock that contain or are contaminated with regulated substances.

On June 11, 2007 Continuous Link Color notified Ohio EPA that they ceased operations on June 7, 2007. The CRO regulations require that the above actions be completed within 90 days of cessation of regulated operations, in your case by September 5, 2007. To date Continuous Link Color has failed to submit a copy of the most recent emergency and hazardous chemical inventory form submitted to the State Emergency Response Commission, including a statement indicating whether any asbestos-containing materials are present at the facility, the most current hazardous chemical list, and a written CRO certification provided on the form prescribed by the director (Regulated Substances & Equipment Removal 90-Day Form, EPA 0329) and failed to remove all regulated substances from the facility, in violation of OAC rule 3745-352-20(A)(2).

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- Continuous Link Color must immediately do the following: 1) legally remove all regulated substances from the facility and send Ohio EPA documentation that this has been done such as photos, waste manifests or bills of lading, and any other documentation deemed appropriate, 2) prepare, complete and submit your CRO certification provided on the form prescribed by the director (Regulated Substance & Equipment Removal 90-Day Form, EPA 0329).

Please remove all regulated substance from the facility and submit the requested documentation demonstrating abatement of the above violation to the Southwest District Office within 30 days of receipt of this letter. You can find copies of the laws and other information on the division's web page at [www.epa.state.oh.us/dhwm](http://www.epa.state.oh.us/dhwm). If you should have any questions, please feel free to call me at (937) 285-6081.

Sincerely,



Steven Roth, P.E.  
Environmental Specialist  
Division of Hazardous Waste Management

cc: Butler County LEPC  
City of Fairfield Fire Department  
Ralph McGinnis, CAS, DHWM/CO

SR/plh