



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

August 18, 2010

RE: AGMET METALS, INC.  
MAPLE HTS  
CUYAHOGA COUNTY  
VARIANCE COMPLIANCE INSPECTION  
NOV

Steve Jones  
Manager of Operations  
Agmet Metals, Inc.  
5533 Dunham Rd  
Maple Hts., OH 44137

Dear Mr. Jones:

On June 1, 2010, Kris Coder and I inspected the Agmet Maple Heights facility to determine its compliance with its variance, Ohio's hazardous waste, used oil and universal waste rules as found in Chapter 3745 of the Ohio Administrative Code and Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code. Our inspection included a review of your operations and records. Fred Warren, Conrad Hornung, and Brian Dasher accompanied us on our plant tour. In addition Rajesh Shah accompanied us during the tour of the liquids portion of the facility. Pictures were taken during the tour.

In an e-mail on June 11, 2010 and in a letter dated June 21, 2010 we requested additional information including the metal content and an explanation of the intended use of the material in a list of containers. We received the requested information on June 25, 2010 and additional clarifying information on August 5, 2010. In general, it appears you have either already processed or intend to process these materials within 90 days.

We noted the following violations during our inspection.

**1. Used Oil Container Labeling - OAC 3745-279-22(C)**

We understand swarf is received at the facility in open head drums. The swarf is transferred into one of two stationary roll-offs in the process building. Oils that drain from the swarf are pumped out of the roll-off and sent off-site for recycling and the swarf is then scooped out and placed in bunkers on the process floor for mixing with other materials. The roll-offs were not labeled 'used oil' as required.

Please label the roll-offs immediately and submit a picture of each documenting that the proper labels have been added.

**2. Personnel Training - Variance Condition 2.q.**

We were provided with a copy of the training matrix. It is unclear if all employees have completed the required training since some position descriptions in the matrix are not listed in the key at the top with their required training modules. Solutions Labor, Lab Technician, Maintenance Technician, S&R Labor, 2<sup>nd</sup> Shift Foreman,

Foreman, Office Coordinator, and Maintenance Electrician are positions listed for various employees in the chart but those are not listed job descriptions at the top where the required modules are defined by job description.

Please define the required training modules for these additional job titles or revise the job titles in the chart to be consistent with those listed in the key at the top for which training requirements have been defined. Submit the revised training matrix documenting the required training has been completed by the appropriate employees.

The following concerns were noted.

1. There was some green staining on the concrete south of building 202. We understand a hose flopped out of a tanker causing a small spill. The spill was cleaned up but the staining remains. We understand you will try to power wash &/or use trisodium phosphate to clean the concrete.
2. There is a storm sewer immediately outside of the east garage door of building 201. It appears at least part of the floor of the liquids storage building slopes directly toward this sewer. Facility representatives said they would investigate ways to prevent possible spillage in the building from entering this sewer.
3. Oil from swarf in a bunker in building 135 was running across the concrete floor towards the east exterior wall. We were told that the oil would be cleaned up immediately.
4. There were some green puddles and blue-green material spilled on the floor of building 127. We were told the material would be cleaned up and placed in the processing area.
5. There were some drums labeled 'LMC filtercake' outside of building 126 that were in poor condition. We understand the contents of those drums have since been placed into bunkers in the process building.
6. We were provided with a copy of your updated Spill Response Plan. On pages 4 and 5, only Ohio EPA's daytime phone number is listed. Please include our 24 hour emergency spill reporting number, 800-282-9378.

Also your original spill response plan included language addressing bulk material tracked from the building. (All mobile equipment must be brushed and swept free from material prior to leaving the building. In the event tracking is discovered, it will be responded to as a spill and cleaned immediately upon discovery. Written reports are mandatory for all spill events.) I don't see this language included in your revised plan. Please include it.

MAPLE HTS.

AGMET METALS, INC., OAKWOOD CEI  
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**Please provide the requested return to compliance documentation for the above violations within 30 days of the date of this letter. Also please address the above concerns in your response letter, confirming what actions have been taken.**

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides compliance and pollution prevention assistance on environmental issues related to air, land and water. OCAPP operates confidentially. Information obtained by that office is not shared with Ohio EPA inspection or enforcement staff. They can be contacted at 800-329-7518 or <http://www.epa.ohio.gov/ocapp>.

If you have any questions related to this letter, feel free to call me at (330) 963-1226.

Sincerely



Sheryl K. Slone, P.E.  
Environmental Engineer  
Division of Hazardous Waste Management

SKS:ddw

ec: Natalie Oryshkewych, DHWM, NEDO  
Karen Hale, DHWM, CO  
Nyall McKenna, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Kris Coder, DHWM, NEDO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.

