



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

April 16, 2012

RE: DDI CLEVELAND, CORP
OHR000029793
SUMMIT COUNTY
LQG CEI NOV#2/PRTC

Clyde Earp, EHS&S Supervisor
DDi Cleveland, Corp.
12080 DeBartolo Dr.
N. Jackson, OH 44451-0216

Dear Mr. Earp:

Thank you for your April 5, 2012 response to my April 4, 2012 notice of violations letter. Your response included photographs, training documentation, manifests, land disposal restriction notifications, and a spill response plan. The following violations have been adequately addressed.

4. Satellite Containers of Hazardous Waste – OAC 3745-52-34(C)(1)(a)
5. Closed Container – OAC 3745-66-73(A)
6. LDR Notification Form – OAC 3745-270-07(A)(2) and (8)
7. Unlabeled Universal Waste Batteries – OAC 3745-273-14(A)
8. Open Containers of Universal Waste Lamps – OAC 3745-273-13(D)(1)
9. Universal Waste Lamps Labeling – OAC 3745-273-14(E)
10. Universal Waste Batteries Accumulation Time – OAC 273-15(A)
11. Used Oil Container Label – OAC 3745-279-22(C)

The following violations continue and need to be immediately addressed.

1. Personnel Training – OAC 3745-65-16(A)(1-3), (B), (C), (D)(1-4), and (E)

As a large quantity generator of hazardous waste you are required to have a personnel training program as described in the cited rules and maintain documentation of such. Your response included documentation that your wastewater treatment plant operator has had spill response training on 9/30/11 and your production manager had HAZWOPER training on 5/8/09. The following documentation is still needed.

- a. Job titles for each position at the facility related to hazardous waste management.
- b. The name of every employee filling these job titles.
- c. A job description for each of these job titles that includes the requisite skill, education or other qualifications, and duties.
- d. A written description of the type and amount of both introductory and continuing training that will be given to each of these employees. Our file has a training matrix (copy enclosed) that was previously submitted by DDi that shows the type of training required for each job title and its required frequency. Of importance to document compliance with the hazardous waste rules are the last three training courses listed on this matrix. Also note that hazardous waste training including contingency plan implementation is required annually.
- e. Records that document that this training has been completed by these employees including sign-in sheets for each of these 3 courses.

You will also need to indicate who directs the training program and show that this person is trained in hazardous waste management procedures. You will need to confirm that training records will be kept for at least 3 years for former employees and until closure of the facility for current employees.

2. Contingency Plan – OAC 3745-65-51(A) and (B), 3745-65-52(A) through (F), 3745-65-53(A) and (B), and 3745-65-55

As an LQG you are required to have a contingency plan as described in the cited rules. You submitted a "Spill Response, Containment, and Cleanup plan". While this plan meets some of the requirements of a hazardous waste contingency plan it does not meet all of them. Among other things, it does not include actions to be taken in response to a fire or explosion. It does not include arrangements with local emergency authorities, or a list of emergency coordinators with their addresses and telephone numbers. It does not include a list of all emergency equipment with its location, description and outline of its capabilities.

In looking through our file on your facility, we do have a copy of your previously acceptable contingency plan which I have enclosed. It might be easier to review and update it rather than try to add everything to your spill plan. If you would like us to consider your previous hazardous waste contingency plan for compliance with these rules, please review and update it as needed and resubmit indicating it is your current contingency plan. You will also need to document that the properly updated contingency plan has been provided to all local emergency authorities.

3. Waste Evaluation – OAC 3745-52-11

A generator must determine for any wastes generated if those wastes are hazardous wastes in accordance with the procedures in this rule. DDi has not determined if the isopropyl alcohol rags in the routing area that are used to wipe drilling dust off tables are a hazardous waste. Also DDi has not determined if the filters removed from the plating baths are a hazardous waste before being cleaned and disposed of as a solid waste. We understand you are awaiting results of TCLP testing for both of these waste streams and will be providing your written waste determinations after those results are received.

Please be advised that the violations cited above will continue until the violations have been properly abated. **Within 7 days of the date of this letter, please provide the documentation requested above.** The documentation may be submitted via the postal service or electronically to sherry.slone@epa.ohio.gov. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that DDi return to compliance. If circumstances delay the abatement of violations, you are requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

The hazardous waste rules cited can be found on our division's web page at: <http://www.epa.ohio.gov/dhwm/>. If you have any questions concerning this letter, please contact me by telephone at (330) 963-1226 or by e-mail at sherry.slone@epa.ohio.gov.

Sincerely,



Sheryl K. Slone, P.E.
District Engineer
Division of Materials and Waste Management

SKS:ddw
Enclosures

ec: Nyall McKenna, DMWM, NEDO
Jeff Mayhugh, DMWM, CO

COURSE	CFR	DESCRIPTION/ INSTRUCTOR/ COMPANY	FREQUENCY	ALL PERSONNEL	MANAGERS	TEAMLEADS/ SUPERVISORS	SHIPPING AND RECEIVING	MAINTENANCE	WASTE TREATMENT	EMERGENCY TEAM MEMBERS	EHS MANAGEMENT TEAM	JOINT HEALTH AND SAFETY COMMITTEE	WETPRO	LAB
LOCKOUT/TAGOUT	29 CFR 1910.147	INTERNAL	ANNUALLY	X										
FIRE PREVENTION	29 CFR 1910.39	INTERNAL	ANNUALLY	X										
EMERGENCY PROCEDURES	29 CFR 1910	INTERNAL	ANNUALLY	X										
HAZARD COMMUNACATION	29 CFR 1910.120A	INTERNAL	ANNUALLY	X										
INJURY AND ILLNESS REPORTING	29 CFR 1910.120A	INTERNAL	ANNUALLY	X										
ACCIDENT/ INCIDENT INVESTIGATION	29 CFR 1910.120A	INTERNAL	ANNUALLY		X					X	X	X		
CPR/FIRSTAID		EXTERNAL	3 YR/1YR							X	X			
FORKLIFT	29 CFR 1910.178	EXTERNAL	3 YR					X	X		X			
RESPIRATOR USE AND SELECTION	29 CFR 1910.134	INTERNAL	ANNUALLY					X	X		X			
MACHINE GUARDING	29 CFR 1910.212	INTERNAL	ANNUALLY	X										
RETURN TO WORK		INTERNAL	ANNUALLY		X						X	X		
LEAD CONTROL	29 CFR 1910.1025	INTERNAL	ANNUALLY					X	X	X	X	X	X	X
HAZWOPPER	29 CFR 1910.120A	INTERNAL	ANNUALLY						X		X			
DOT HAZMAT	49 CFR PART 171	EXTERNAL	3 YR						X	X				
HAZARDOUS WASTE MANAGEMENT	3745-65	INTERNAL	ANNUALLY						X		X			
UNIVERSAL WASTE REGULATIONS	3745-273	INTERNAL	ANNUALLY					X	X		X			
HAZARDOUS WASTE CONTINGENCY PLAN	3745-65-52	INTERNAL	ANNUALLY		X				X	X	X			

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JUN 21 2007

OHIO EPA NEDO

Coretec Cleveland, Inc.

Hazardous Waste Contingency Plan

Document ID number: EA 0014

Date issued: 4/17/07

Revision: NONE

Approved: _____



1.0 PURPOSE

This procedure establishes the Hazardous Waste Contingency Plan for the storage of hazardous wastes at Coretec Cleveland. The purpose of the Plan is, as stated in 40 CFR 265.51(a), to “minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of Hazardous waste or Hazardous waste constituents to air, soil, or surface water.”

2.0 APPLICATION

The provisions of this plan are to be carried out immediately whenever there is a fire, Explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Specifically, this plan addresses emergencies related to hazardous wastes stored at Coretec Cleveland (referred to as the “Facility”). This plan does not cover

1) hazardous wastes managed as part of satellite accumulation areas; 2) virgin chemicals, such as those stored within laboratories and chemical stock areas.

3.0 AUTHORITY

Title 40 Code of Federal Regulations (CFR) 265.50 through 265.56
[as referenced in 40 CFR 262.34(a)(4)]
OAC Rule 3745

4.0 FACILITY DESCRIPTION

4.1 Facility Location

The facility is located at:

7 Ascot Parkway Cuyahoga Falls OH 44223

All of the waste is handled within the facility in and near the waste treatment area of the facility.

4.3 Facility Operation

The hazardous waste Storage area serves as the location where hazardous wastes are stored prior to being picked up for recycle or disposal by a licensed hazardous waste transporter. Hazardous wastes are generally generated in one of three ways:

1. As part of manufacturing of circuit boards.
2. As part of testing chemical baths.
3. As a result of the clean-out of old, expired, and unused chemicals

Typically, hazardous wastes generated in the first two processes described above are accumulated near the point of generation in satellite accumulation areas (The provisions of this plan are to be carried out immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or

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the environment. Specifically, this plan addresses emergencies related to hazardous wastes stored at Coretec Cleveland (referred to as the "Facility"). This plan does not cover

- 1) hazardous wastes managed as part of satellite accumulation areas; 2) virgin chemicals, such as those stored within laboratories and chemical stock rooms. SAAs). Once the accumulation containers are full, they are transferred to the Waste treatment area for treatment or held for shipment. Old, expired, and unused chemicals are typically transferred directly to the Waste treatment area of the facility, once they are declared a waste.

Due to a high amount etch used in the facility Coretec Cleveland is classified as Large Quantity Generator (LQG). As such, hazardous wastes may be stored at for a maximum of 90 days before being removed for disposal or recycle by a licensed hazardous waste transporter.

A Contingency Plan is required for all LQGs of hazardous waste.

5.0 CONTACTS (i.e., EMERGENCY COORDINATOR)

5.1 Identification of the Emergency Coordinator

As required in 40 CFR 265.55, at all times, there is at least one employee either on the Facility premises or on call (i.e., available to respond to an emergency by reaching the Facility within a short period of time) with the responsibility for coordinating all emergency response measures. The sole emergency coordinator at Coretec Cleveland, who meets the qualifications listed below, is:

John Cestraic
Emergency Coordinator
Engineering manager
Coretec Cleveland, Inc.
7 Ascot Parkway
Cuyahoga Falls, OH 44223
Desk Phone (330) 572-3406
Mobile phone (330) 858-2593
Home address: 381 Halifax Lane
Medina, Ohio 44256
Home Phone#: (330) 723-8352

Bob Owen
Alternate Emergency Coordinator
General Manager
Coretec Cleveland
7 Ascot Parkway
Cuyahoga Falls, OH 44223
Office phone (330) 572-3413
Mobile phone (330) 807-3476
Home address: 4468 Ridge Crest Drive
Copley, Ohio 44321
Coretec Cleveland, Inc.
7 Ascot parkway Cuyahoga Falls OH 44223
www.coretec-inc.com

Home phone#: (330) 666-7135

The implementation of this plan in the event of an emergency is the responsibility of the emergency coordinator. This emergency coordinator is thoroughly familiar with all aspects of the Facility's Contingency Plan, all operations and activities at the Facility, the location and characteristic of waste handled, the location of records within the Facility, and the Facility layout. In addition, this person has the authority to commit the resources needed to carry out the Contingency Plan.

5.2 Roles, Responsibilities, and Other Requirements of the Emergency Coordinator As stated above, the emergency coordinator is responsible for the implementation of this plan in the event of an emergency at the Coretec Cleveland hazardous waste Storage Area. Specific duties once an emergency is identified are described in Section

5.3 In general, the emergency coordinator is in charge of all initial actions taken in response to an emergency. The emergency coordinator continues in this lead role until the Akron Fire Department arrives, as which time he relinquishes control to the Akron Fire Department's Incident Commander. Once control is relinquished, the emergency coordinator acts as a liaison between the Incident Commander and Coretec Cleveland personnel. The emergency coordinator inspects the emergency equipment on a monthly basis (see Section 8.0) to ensure that items are present and operational. The emergency coordinator also reviews this Contingency Plan annually (see Section 10.0) to ensure that it is kept current.

6.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

Under 40 CFR 265.37, a facility must attempt to make the following arrangements, where applicable:

- Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes;
- Agreements with state emergency response teams, emergency response contractors, and equipment suppliers; and
- Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

Coretec Cleveland has attempted to make the abovementioned arrangements with the list of local authorities provided in Section 9.0. Letters will be maintained on-file at the Coretec Cleveland.



7.0 EMERGENCY PROCEDURES

7.1 Initial Response – Emergency Coordinator

In order to comply with the applicable regulations and minimize the hazards associated with an emergency situation, the emergency coordinator must take the following actions upon discovery of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the Facility:

1. Immediately activate internal Facility alarms or communications systems to notify potentially affected personnel. The alarm communicates directly to Akron Fire Department. Assist in evacuation of affected persons, following the evacuation plan included in Attachment 1.
2. Immediately notify the Akron Fire Department (911 as appropriate). It is not necessary to separately notify the SERC or the Summit County LEPC at this time. (See EA006 for reporting procedures)
3. Immediately identify the character, exact source, amount, and real extent of any released materials. This may be done by observation or review of Facility records/manifests and, if necessary, by chemical analysis.
4. Assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion.
5. If it is determined that human health or the environment *outside* of the hazardous waste Storage area is threatened:

a. Immediately notify the Akron fire department if evacuation of local areas may be advisable. Also, be available to help appropriate officials decide whether local areas should be evacuated. If additional evacuation is deemed necessary, evacuation should follow the plan included in Attachment 1.

b. Immediately notify the National Response Center (800-424-8802).

This notification must include the following information:

- Name and telephone number of the reporter (i.e., emergency coordinator)
- Name and address of the Facility
- Time and type of incident (e.g., release, fire)
- Name and quantity of material(s) involved, to the extent known:
- The extent of injuries, if any
- The possible hazards to human health or the environment outside of the facility

7.2 Continued Response – Emergency Coordinator



During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas of the Facility. These measures must include collecting and containing released waste and removing or isolating containers. As stated in Section 5.2, the emergency coordinator continues in the lead role until the Akron Fire Department arrives, at which time he relinquishes control to the Akron Fire Department's Incident Commander. Once control is relinquished, the emergency coordinator acts as a liaison between the Incident Commander and Coretec personnel during the continued emergency response phase.

Within 24 hours of the emergency, the emergency coordinator must complete a written "Account form"(Attachment 2) and mail it to OEPA, the SERC, and the Summit LEPC.

7.3 Post-Response Actions – Emergency Coordinator

Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion at the Facility. It should be noted that this waste should be handled according to applicable hazardous waste requirements. The emergency coordinator must also ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed. Additionally, he must ensure that all emergency equipment used is cleaned and rendered fit for its intended use. Once the tasks in the above paragraph are completed, the emergency coordinator must notify the OEPA Administrators that the appropriate measures described above have been taken. After this notification, with the Administrators' approvals, normal operations can resume. The time, date, and details of any incident that requires the implementation of this Contingency Plan will be noted and maintained with the inspection logs for the Facility. Additionally, within 15 days of the incident, the emergency coordinator will submit a written report on the incident to the OEPA Administrators. The report will include:

- Name, address, and telephone number of the owner or operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident (e.g., fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, if applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

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8.0 EMERGENCY EQUIPMENT

A list of all emergency equipment at the Facility is included as Attachment 3. The list also includes the location and a physical description of each item, along with a brief outline of each item's capabilities. The emergency coordinator or his designee will inspect the presence and condition of emergency equipment on a monthly basis, using the inspection sheet in Attachment 3. Emergency kit # 1 is in the receiving area next to the bathrooms on the north side of the facility. Emergency kit #2 is located next to the chemical storage area located on the south end of wastetreatment.

9.0 PLAN DISTRIBUTION

A copy of this Contingency Plan and all revisions to the Plan is maintained at the Coretec Cleveland general manager office, waste treatment, and the emergency coordinators office. In addition, a copy has been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Specifically, this Contingency Plan for the Facility at Coretec Cleveland has been provided to the following parties:

Akron Police Department

120 Main Street
Akron OH, 44223
330-375-2181
Attn: Chief of Police

Akron Fire Department

Akron OH, 44223
330-788-9292
Attn: Fire Marshall

Cuyahoga Falls General Hospital

1900 23rd street
Cuyahoga Falls OH 44223
330-971-7000
Attn: Emergency Coordinator

Summit County LEPC

175 S. Main Street (suite 204)
Akron OH, 44308
330-643-2558
Attn: Annette Petranic

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OHIO ENVIRONMENTAL PROTECTION AGENCY

Division of Emergency and Remedial Response

Northeast District Office

2110 Twinsburg, Ohio 44087

Phone: (330) 963-1200

Spill Reporting (800) 282-9378

10.0 PLAN AMENDMENTS AND REVIEW

This Contingency Plan will be reviewed, and immediately amended, if necessary, whenever:

- Applicable regulations are revised;
 - The Plan fails in an emergency;
 - The emergency coordinator changes, or an alternate emergency coordinator is added;
 - The list of emergency equipment changes;
 - The Facility changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents; or
 - The Facility changes (in its design, construction, operation, maintenance, or other Circumstances) in a way that changes the response necessary in an emergency.
- Minor revisions (i.e., affecting only a few pages) will be indicated by a letter after the revision number (e.g., Revision 1a), accompanied by the date of the revision. Major revisions will be assigned the next sequential revision number (e.g., Revision 2), accompanied by the date of the revision. Amendments will be distributed to all parties listed in Section 9.0 of this Plan. In the case of minor revisions, only affected pages (with instructions on how to replace the revised sections) will be sent. All amendments will be mailed with a transmittal form letter (Attachment 4), requesting a return response to indicate receipt of the amendments.

In order to ensure that this Contingency Plan is amended as necessary, the Plan will be reviewed annually by the emergency coordinator. The annual review will be documented on a checklist (Attachment 5) and kept on-file as documentation. Any required revisions identified will be made and distributed as described above.

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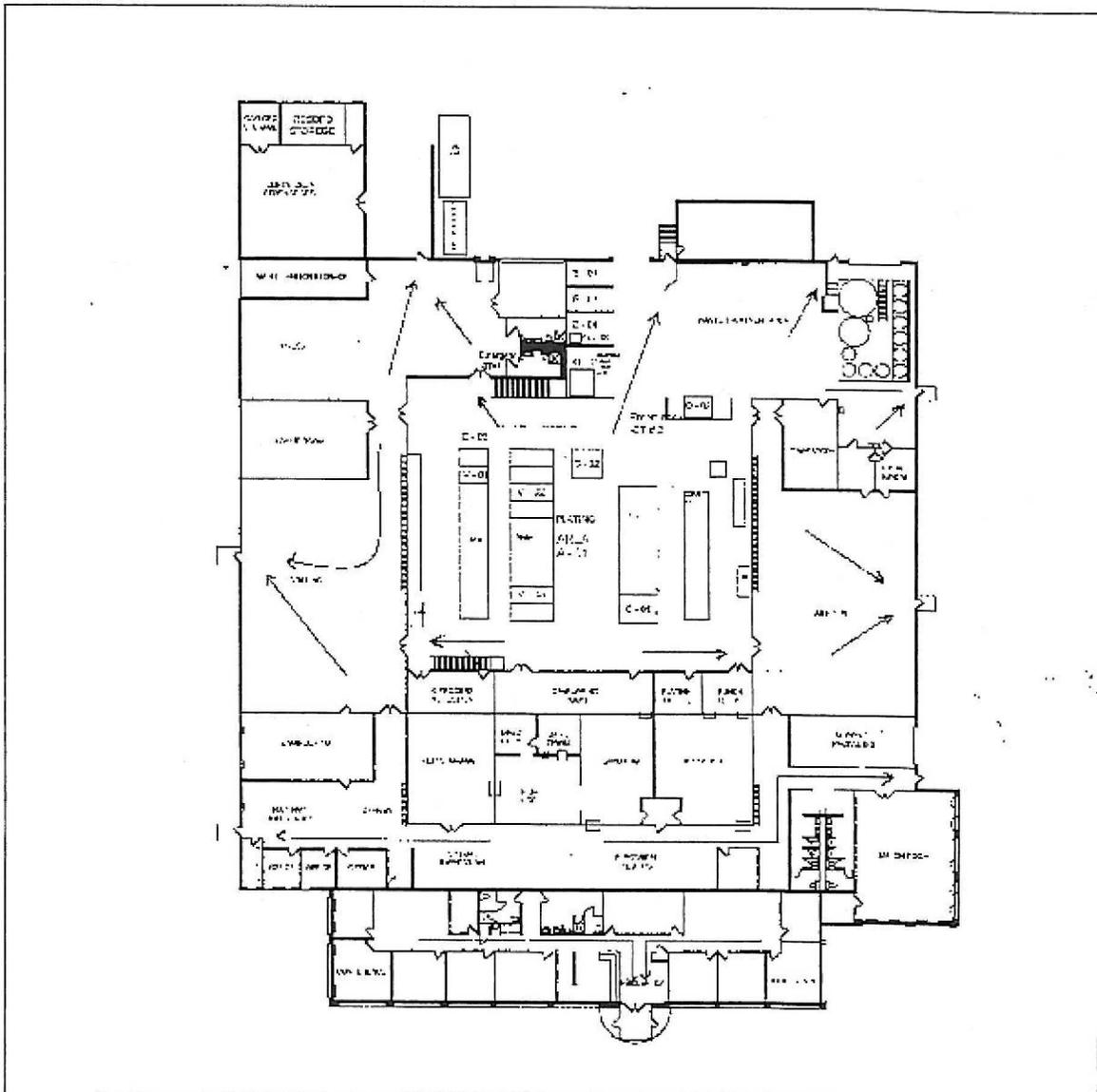


Revision Record:

Rev:	Description:	Date:	Revision Author:



Attach #1 Evacuation Map



ASCOT PARKWAY Evacuation routes



CORETEC INC

7 Ascot Parkway
Cuyahoga Falls, OH 4420



ATTACHMENT 3 LIST OF EMERGENCY EQUIPMENT

Date _____

Inspector _____

Time _____

Signature _____

Shipping Kit

ITEM	QUANTITY	PHYSICAL DESCRIPTION CAPABILITIES	NOTES	ACCEPTABLE CONDITION	UNACCEPTABLE CONDITION
Chemical absorbent squares		Able to absorb about a gal of solution each and used defense of spill			
Spill response kit (including absorbent socks)		Has chem. Boom, Gloves, glasses in a small 5 gal bucket.			
Drum repair kit		Able to repair small holes in drum			
Warning light		Used to make other aware			
Caution / danger tape		to block off area			
Chemical suits		Used to protect employee from hazardous material			
Safety gloves		Can be used with strong acids or strong caustic			
Lab sleeves		Used to protect arms from strong chemistry			
Safety goggles		To protect from chemical splashes			
Rubber boots		Protect feet from strong chemistry			
Visibility safety vests		Used to make it easier to be seen			
Vinyl apron		To protect body from strong chemistry			
Face shield		Protect face from splashes			
Lime		Used to neutralize acid and help in clean up			

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(Describe any inadequate or missing items on back of form)

ATTACHMENT 4 LIST OF EMERGENCY EQUIPMENT

Date _____ Inspector _____

Time _____ Signature _____

Chemical Storage Emergency Kit

ITEM	QUANTITY	PHYSICAL DESCRIPTION CAPABILITIES	NOTES	ACCEPTABLE CONDITION	UNACCEPTABLE CONDITION
Chemical absorbent squares		Able to absorb about a gal of solution each and used defense of spill			
Spill response kit (including absorbent socks)		Has chem. Boom, Gloves, glasses in a small 5 gal bucket.			
Caution / danger tape		to block off area			
Chemical suits		Used to protect employee from hazardous material			
Safety gloves		Can be used with strong acids or strong caustic			
Lab sleeves		Used to protect arms from strong chemistry			
Safety goggles		To protect from chemical splashes			
Rubber boots		Protect feet from strong chemistry			
Visibility safety vests		Used to make it easier to be seen			
Vinyl apron		To protect body from strong chemistry			
Face shield		Protect face from splashes			
Lime		Used to neutralize acid and help in clean			

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(Describe any inadequate or missing items on back of form)

Additional Personal Protective Equipment Available in Locker 106

ATTACHMENT 5 Contingency Plan annual checklists

Annual Contingency Plan Review Checklist

Date of this review: _____

Reviewer: _____ (print) _____ (signature)

Criteria (i.e., did any of these occur in the past year?)	YES	NO
1. Regulations governing the scope and extent of this plan were revised.		
2. The Plan failed in an emergency.		
3. The emergency coordinator changed. (This includes address and phone changes, as well as changes in personnel of the addition of an alternate emergency coordinator.)		
4. The list of emergency equipment changes.		
5. The facility changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases hazardous waste or hazardous waste constituents.		
6. The facility changed (in its design, construction, operation, maintenance, or other circumstances) in a way that changes the response necessary in an emergency.		

SUMMARY:

_____ There have been no changes since last Contingency plan review

_____ Changes have occurred and the Contingency Plan must be modified as follow:

