



State of Ohio Environmental Protection Agency

Northeast District Office



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Twinsburg, Ohio 44087

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

April 14, 2010

Nick Pamboukis
Heritage Industrial Finishing
1874 Englewood Ave
Akron, OH 44312

**RE: HERITAGE INDUSTRIAL FINISHING, OHD 004 538 567, SUMMIT COUNTY, CEI,
NOTICE OF VIOLATION/PARTIAL RETURN TO COMPLIANCE**

Dear Mr. Pamboukis:

On April 5, 2010, Ohio EPA's Division of Hazardous Waste Management, represented by Edward D'Amato and Robert Almquist, inspected Heritage Industrial Finishing located at 1874 Englewood for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC). Heritage Industrial Finishing was represented by you and Billy Adams.

Heritage Industrial Finishing paints parts for military and industrial applications. The facility is a conditionally exempt small quantity generator (<100 lbs per month).

The following waste streams were identified:

- Spent cleaning solvent (hazardous waste)
- Waste paint-related material, solid (non-hazardous per analytical data).
- Paint filters (non-hazardous per analytical data).
- Universal waste lamps.

The following violations were found. In order to correct them you must do the following and send me all requested information **within 30 days** of the date of this letter:

**1. Universal Waste Management Standards—Containers
OAC 3745-273-13(D) and 14(E)**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound and adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage

Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste Lamp(s)", or "Used Lamp(s)"

There was one box of lamps that was not labeled and closed per these rules. To correct this violation, you must label the box and close it. You must photograph it and send the photograph to this office.

**2. Accumulation Time for Universal Waste
OAC 3745-273-15**

A facility must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste

Heritage Industrial Finishing was unable to verify the length of time that the universal waste lamps have been accumulated. To correct this violation, you must explain, in writing, how Heritage Industrial Finishing will comply with this rule from now on.

**3. Used Oil Storage Requirements for Generators (Labels)
OAC 3745-279-22(C)**

Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words "Used Oil"

There was one drum of used oil that was not labeled per this rule. This violation was corrected during the inspection when you put a used oil label on the drum. No further action is required regarding this violation.

Ohio EPA has the following suggestions for Heritage Industrial Finishing. Heritage Industrial Finishing is under no obligation to implement any of them. Please note that any links to specific companies are provided for informational purposes. Ohio EPA does not recommend specific products or companies. This information was also sent to you via e-mail on April 9, 2010:

1. Heritage Industrial Finishing may benefit from an energy audit. The US Department of Energy has an energy assessment program. More information can be found at:

<http://www1.eere.energy.gov/industry/saveenergynow/assessments.html>

The Ohio Department of Development, Office of Energy Efficiency offers various resources to assist Ohio companies in reducing energy usage. More information can be found at:

http://development.ohio.gov/cdd/oeec/i_services.htm

One area in particular where Heritage Industrial Finishing may be able to save money in a relatively short pay-back time is through energy efficient lighting. Below are two links to case studies of re-lamping projects in industrial settings:

Arizona Republic newspaper plant, 35 month payback:

<http://www.earthsavers.com/brochures/Industrial.pdf>

A Caterpillar Paving Products, 18 month payback:

http://6cp.us/1/email_builder/pview/16672/MTQz.html

Daylighting may also be an option to consider. Studies have shown that, in addition to energy savings, daylighting can increase employee productivity:

Federal Energy Managers See Daylight To Energy Savings

http://www1.eere.energy.gov/femp/news/news_detail.html?news_id=7148

Day & Nite Solar Lite:

<http://www.cooldaylight.com/>

Daylighting systems, Pfister Energy:

<http://pfisterenergy.com/daylighting.asp>

2. Heritage Industrial Finishing may be able to reduce solvent use through the use of "poly pigs" to clean paint lines. Below are some resources and information from Ohio EPA's Office of Compliance and Pollution Prevention about the technology. These and other resources were e-mailed to you on April 9, 2010:

Piggable Paint Supply and Distribution Systems

<http://www.napaint.com/piggable.paint.systems.htm>

Poly pigs case study, Ford Kentucky truck plant:

<http://www.ford.com/microsites/sustainability-report-2008-09/environment-operations-waste>

Strategies: Continental Structural Plastics

'Piggable' Paint Recirculation Is Key to Efficient Color Changes

<http://www.ptonline.com/articles/200904bib2.html>

3. You may be interested to know that the Ohio Department of Development offers financial assistance to businesses for capital investment needs such as: renovation, equipment purchases, land and building acquisition, construction, and expansion. More information can be found at:

http://www.odod.state.oh.us/EDD/Loans_Grants.htm

You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at: <http://www.epa.ohio.gov/ocapp> is also a good source of information.

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The Division of Hazardous Waste Management has created an electronic news service to provide timely updates on rule changes and other news related to hazardous waste in Ohio. We encourage you to sign-up for this free service at <http://www.epa.ohio.gov/dhwm>.

Enclosed is a copy of the checklists used for the inspection.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Failure to list specific deficiencies or violations in this communication does not relieve Heritage Industrial Finishing from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

Enclosure

ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION Heritage Industrial Finishing

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")] Yes No N/A

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No N/A

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:

a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MIX HAZARDOUS WASTE WITH USED OIL

5. Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:

	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>



PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Heritage Ind. Finishing Facility Type: LQG/SQG/CESQG/TSD EPA ID#:

Description of Waste				On-Site Management		Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Name of TSD.
1 Painting	Mixed Paint Waste	D001 F003	2220 lbs per mo.	Container		Chemitron
2 Painting	Paint filters	Non-haz				
3						
4						
5						
6						
7						

