



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

September 5, 2008

Mr. Bill Kozak Jr.
3200 W. 121st Street
Cleveland, OH 44111-1700

**RE: GUARANTEED FINISHING UNLIMITED, INC., CUYAHOGA COUNTY
OHD 107 109 563, PARTIAL RETURN TO COMPLIANCE/NOV #3**

Dear Mr. Kozak:

On July 28, 2008, the Ohio EPA received a response to our letters dated April 22 and July 9, 2008, notifying you of violations of the hazardous waste rules. Your response included analytical results, a list of employee names with their job title, receipts for scrap metal and battery cores, facility photos of former storage areas and a cover letter indicating that all fluorescent lamps are to be recycled.

Review of the provided information indicates that the following violation has been abated:

- 5) OAC 3745-65-35, Required aisle space.

Additional Violation

- 10)Waste Evaluation, OAC 3745-52-11:** Any person who generates a waste must evaluate the waste to determine if the waste is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

At my inspection, you identified routine waste streams that accumulate in drums as hazardous wastes and periodic cleanouts that generate hazardous waste consisting of D002, D006 and D007 wastes. The analytical results you submitted by mail after the inspection indicate the mixture of wastes sent off-site was non-hazardous. However, these results appear to be based on a composite sample from all waste streams some of which appear not to be hazardous.

To abate this violation, GFU must identify all processes and cleanouts that generate hazardous waste. Provide your hazardous waste characterization for periodic cleanouts, plating baths and tank clean outs separately. In your characterization, provide the frequency and quantities of **each waste stream generated** and all relevant documentation (generator knowledge, Material Safety Data or analytical data) that supports your waste determination for each. Once this information is received, Ohio EPA can determine the status of the previous violations.

GUARANTEED FINISHING UNLIMITED, INC.
SEPTEMBER 5, 2008
PAGE - 2 -

Please respond to this letter in writing **within 20 days** of the date of this letter by providing the information requested above. Should you have any questions or require additional information, you may contact me at (330) 963-1146 or at ron.shadrach@epa.state.oh.us.

Be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

Sincerely,



Ronald J. Shadrach
Division of Hazardous Waste Management

RJS:ddw

ec: Frank Popotnik, 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 all applicable regulations.