



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 467-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

CERTIFIED MAIL

January 25, 2007

Kelley Gallagher
Lab Manager
Lexington Connector Seals
1510 Ride Rd.
Vienna, OH 44473

**RE: LEXINGTON CONNECTOR SEALS, OHD987013752, TRUMBULL COUNTY,
NOV/PRTC**

Dear Ms. Gallagher:

On January 16, 2007, Wade Balser and I, representing Ohio EPA's Division of Hazardous Waste Management (DHWM), visited Lexington Connector Seals (LCS) located at 1510 Ride Road, Vienna, Ohio to conduct an unannounced hazardous waste compliance evaluation inspection (CEI). LCS was represented by Gregory Wood and you.

On January 19 and 24, 2007, I received your responses concerning inspection related information.

The purpose of the inspection was to determine LCS's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). The inspection included a review of the facility's operations, as well as the management of wastes.

Due to a laboratory clean-out event in September 2006, LCS attained a large quantity generator (LQG) status of hazardous waste. However, during the January 16, 2007 inspection, it did not appear that LCS was a LQG. As such, at the time of this inspection, LCS was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste. Please be advised that should LCS generate more than 220 pounds of hazardous waste in a month or store in excess of 2,200 pounds of hazardous waste in any month, the corresponding generator status (i.e., SQG or LQG) with specific OAC regulatory requirements would apply.

As a result of the inspection, the following violations of Ohio's hazardous waste laws were identified:

1. **OAC rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate that waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.
 - A. In 2006, LCS replaced all fluorescent lamps with ones manufactured by General Electric (Ecolux family). The lamps removed in 2006 were disposed as a solid waste. As such, LCS failed to evaluate its spent fluorescent lamps prior to disposal as a solid waste. Currently, LCS intends to dispose of the Ecolux lamps as a solid waste. Ohio EPA encourages LCS to consider recycling its spent lamps in lieu of disposal. For additional information, please find enclosed the document entitled "Universal Waste Rules for Handlers of Lamps, June 2005." **No further information is requested.**
 - B. LCS failed to evaluate the waste stream consisting of spent aerosol cans in accordance with OAC Chapter 3745-51. LCS's January 19, 2007 e-mail indicated that the punctured can (shell) will be recycled (as scrap metal). **No further information is requested.**
2. **OAC rule 3745-65-31, Maintenance and Operation:** Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, Ohio EPA observed caustic liquid (pH \geq 13) in the drip pan beneath the mold cleaning vat. Additionally, evidence of caustic staining was observed on the concrete beneath the mold cleaning vat, as well as around the drip pan. As such, LCS failed to maintain this area in a manner to minimize the possibility of a release of hazardous waste constituents. To abate this violation, LCS must clean-up and properly manage all caustic liquids and associated staining. Please inform me of the corrective, as well as preventative actions taken to abate this violation. Additionally, please submit photographs of the mold cleaning area verifying that the caustic liquid and associated staining was cleaned-up.

Ohio EPA offers the following comments related to the inspection:

1. Since the facility attained a LQG status in September 2006, LCS must submit a hazardous waste generator annual report. For more information, please refer to the following link: <http://www.epa.state.oh.us/dhwm/demwebpg.html>
2. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. LCS may find more information at: <http://www.epa.state.oh.us/dhwm/listserv.html>

3. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land, and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at: <http://www.epa.state.oh.us/opp/ocapp.html>
4. Pollution prevention information is available from Ohio EPA via the internet at http://ohioepapubs.custhelp.com/cgi-bin/ohioepapubs.cfg/php/enduser/std_alp.php
5. Ohio businesses that spend less than \$150,000 on their annual energy bill now have a tool to help them reduce energy waste and hold costs down. The Ohio Department of Development has developed a free online tool that is confidential and easy to use. If you are looking for ways to save on energy expenses, visit: <http://www.energyguide.com/EnergySmartSBE/welcomeba.asp?referrid=227&sid=436>

The above violations must be immediately addressed and all of the above requested documentation of compliance must be submitted to my attention at the Ohio EPA within 30 days of receipt of this letter. You may find copies of the hazardous waste rules and other information on Ohio EPA's web page at: <http://www.epa.state.oh.us/dhwm>.

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

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

cc: Natalie Oryshkewych, DHWM, NEDO
ec: Harry Sarvis, DHWM, CO

Enclosure



E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

**Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No. **EPA ID Number:** OHD987013752

3. Site Name **Name:** Lexington Connector Seals **Website (optional):**

4. Site Location Information
Street Address: 1510 Ridge Rd.
City, Town, or Village: Vienna **State:** OH
County Name: Trumbull **Zip Code:** 44473

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A.	B.
C.	D.

7. Facility Representative:
 Additional names can be recorded in number 12.
 Only provide address information if it is different than the site address.

First Name: Kelley **MI:** **Last Name:** Gallagher
Phone Number: 330-856-1121 **Phone Number Extension:** 160
E-Mail Address: kgallagher@lexp.com
Fax Number: 330-856-8533 **Fax Number Extension:**
Street or P.O. Box:
City, Town or Village:
State: **Country:** **Zip Code:**

8. Legal Owner and Operator of the Site List
 Additional Owners and/or Operators in the Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: **Date Became Owner (mm/dd/yyyy):**

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:
City, Town, or Village: **Owner Phone #:**
State: **Country:** **Zip Code:**

B. Name of Site's Operator: **Date Became Operator (mm/dd/yyyy):**

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:
City, Town, or Village: **Operator Phone #:**
State: **Country:** **Zip Code:**

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

<input type="checkbox"/> Not Regulated
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10. Type of Regulated Waste Activity (Mark in all of the appropriate boxes.)

A. Hazardous Waste Activities								
(choose only one of the following categories)								
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/>	3. Treater, Storer or Disposer of Hazardous Waste						
<input type="checkbox"/> a. Large Quantity Generator (LQG):	<input type="checkbox"/>	4. Recycler of Hazardous Waste						
<input type="checkbox"/> b. Small Quantity Generator (SQG)	<input type="checkbox"/>	5. Exempt Boiler and/or Industrial Furnace						
<input checked="" type="checkbox"/> c. Conditionally Exempt Small Quantity Generator	<input type="checkbox"/>	a. Small Quantity On-site Burner Exemption						
<input type="checkbox"/> d. United States Importer of Hazardous Waste	<input type="checkbox"/>	b. Smelting, Melting, Refining Furnace Exemption						
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<input type="checkbox"/>	6. Underground Injection Control Facility						
	<input type="checkbox"/>	7. Hazardous Waste Transporter						
B. Universal Waste Activities		C. Used Oil Activities						
<input type="checkbox"/> 1. Small Quantity Handler of Universal Waste	<input checked="" type="checkbox"/>	1. Used Oil Generator						
(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):		2. Used Oil Transporter Indicate Type(s) of Activity(ies)						
<input type="checkbox"/> 2. Large Quantity Handler of Universal Waste		<input type="checkbox"/> Transporter						
(accumulates 5,000 kg or more).		<input type="checkbox"/> Transfer Facility						
<input type="checkbox"/> 3. Destination Facility for Universal Waste		3. Used Oil Processor and/or Re-refiner						
(Check all boxes below that apply for each of the three types of facilities above.)		Indicate Type(s) of Activity(ies)						
		<input type="checkbox"/> Processor						
		<input type="checkbox"/> Re-refiner						
		<input type="checkbox"/> 4. Off-Specification Used Oil Burner						
		5. Used Oil Fuel Marketer -						
		Indicate Type(s) of Activity(ies)						
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Oil						
		<input type="checkbox"/> b. Used Oil to Off-Specification Used Oil Burner						
<p>11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRA info source record, you do not need to list them all. Instead just indicate the date of the most recent source record.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%; height: 20px;"></td> <td style="width:25%;"></td> <td style="width:25%;"></td> <td style="width:25%;"></td> </tr> </table>								
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.								
N	Announced?	Additional Facility Representatives: Greg Wood						
N	Tanks?	Other comments: Facility was an episodic LQG in 9/06 due to lab pack.						
Y	Containers?							
<p>13. Name of Inspector(s) Name of Inspector(s) Date of Inspection/Time (mm-dd-yyyy) (HH:MM)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Frank Zingales</td> <td style="width:33%;">Wade Balsler</td> <td style="width:33%;">01-16-2007 / 1010</td> </tr> </table>			Frank Zingales	Wade Balsler	01-16-2007 / 1010			
Frank Zingales	Wade Balsler	01-16-2007 / 1010						
<p>14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Signature of owner, operator, or an authorized representative</td> <td style="width:33%;">Name and Title (Print)</td> <td style="width:33%;">Date (mm-dd-yyyy)</td> </tr> <tr> <td style="height: 40px;"></td> <td></td> <td></td> </tr> </table>			Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)			
Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)						

PROCESS DESCRIPTION / WASTE ACTIVITIES SUMMARY

Facility Name: Lexington Connector Seals

Facility Type: Conditionally Exempt Small Quantity Generator (CESQG) **EPA ID#:** OHD987013752

Process Information: Facility performs rubber molding related activities. Facility manufactures rubber connector and cable seals for automobiles. See matrix for waste generation and amount.

Regulatory / Enforcement History: None to date.

Description of Waste				On-Site Management	Off-Site Management	
Process/Activity Generating Waste	Waste Generated	Waste Code(s)	Quantity Generated	Type of Accumulation	Name, state, and type of activity occurring at the facility.	
1.	QA Lab Area-lab clean-out	Lab pack	Various	Episodic LQG 2320# in 9/06.	Containers-drums	Veolia Technical Solutions W. Carrollton, OH OHD 093 945 293
2.	QA Lab Area-connector/cable seal testing	Used reference fuel	D001	CESQG	5-gallon safety container in lab.	
3.	Aerosol puncturing	Residual contents	D001	CESQG	Container-drum	
4.	Aerosol puncturing	Can/shell (for recycling)				Scrap metal, to be recycled at Niles Iron & Metal Co.
5.	Mold Cleaning Area	Caustic solution				Solution neutralized and discharged to sewer.
6.	Maintenance	Used oil (for recycling)			Container-drum	Environmental Specialists McDonald, OH OHD 000 816 868
7.	Maintenance	Oil filters (for recycling)			Container-drum	Environmental Specialists
8.	Maintenance Area	Spent parts washer solution			Container-drum	Environmental Specialists
9.	Maintenance	Fluorescent lamps				
10.	Maintenance	Rags				Environmental Specialists
11.	Various	Gloves				Laundered
12.	Various	Cardboard, scrap parts, palettes				Recycled



CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

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

WASTE EVALUATION

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

GENERATOR CLASSIFICATION

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

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.

NOTE: To convert from gallons to pounds:

Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3745-51-05(G)(3)] Yes No N/A RMK#

REMARKS

1. See Notice of Violation letter, violation number one.
2. Due to a laboratory clean-out event in September 2006, Lexington Connector Seals (LCS) attained a large quantity generator (LQG) status. However, during the January 16, 2007 inspection, it did not appear that LCS was a LQG. As such, at the time of this inspection, LCS was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste.

