



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

May 10, 2012

RE: ChemMasters
Small Quantity Generator
OHD 157 277 336
Lake County
NOV

Ms. Brenda L. Carr
ChemMasters
300 Edwards Street
Madison, Ohio 44057-3112

Dear Ms. Carr:

Thank you for accompanying Kris Coder and me during Ohio EPA's April 23, 2012 inspection of ChemMasters in Madison, Ohio. We inspected ChemMasters to determine its 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). Our inspection included a review of company operations and written documentation. During the inspection we also helped you identify ways to prevent pollution by reducing waste.

ChemMasters manufactures coatings designed to help cure freshly laid concrete and coatings designed to seal/waterproof concrete. The curing products are primarily a wax/water emulsion which slows evaporation from fresh concrete. The sealer/waterproofing coatings are primarily water based though some are solvent based.

The facility generates spent Propylene Glycol Monomethyl Ether Acetate used in cleaning mixing equipment. Once spent, it is managed as an ignitable hazardous waste (D001). Spent petroleum naphtha is generated in the concrete sealer department and is also managed as an ignitable hazardous waste. The rate of hazardous waste generation classifies ChemMasters as a small quantity generator of hazardous waste. ChemMasters also generates universal waste lamps and batteries and used oil.

We found the following violations of Ohio's hazardous waste laws.

1. **OAC Rule 3745-65-33, Emergency Equipment Inspection:** All facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, must be tested and maintained to assure its proper operation in time of emergency. Inspections must be recorded in a log.

ChemMasters has failed to test its fire protection and spill control equipment and record such inspections in a log. ChemMasters must immediately test its fire protection and spill control equipment and submit a copy of the log used to demonstrate compliance with this rule.

2. **OAC Rule 3745-66-74, Container Accumulation Area Inspection:** The hazardous waste container accumulation area must be inspected weekly with the results recorded in

Ms. Brenda L. Carr
ChemMasters
May 10, 2012
Page 2

a log or summary. At the time of my inspection, no formal inspections were being done or recorded in a log. In your response to this letter, ChemMasters must indicate how procedure has been changed at the facility to ensure this rule is complied with.

ChemMasters must immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, ChemMasters is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service, or electronically to tom.roth@epa.ohio.gov.

Please be advised that the violation cited above will continue until the violation has been properly abated. 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 you return to compliance. If circumstances delay the abatement of the violation, ChemMasters is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (330) 963-1231. You can find copies of the rules and other information on the Division of Materials and Waste Management's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,



Tom Roth
District Representative
Division of Materials and Waste Management

TR/cl
Enclosure

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
Marlene Kinney, DMWM, 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.