



Environmental
Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

May 21, 2012

RE: HARRISON PAINT CO
STARK COUNTY
OHD 004 469 896
LQG, PRTC

Patrick Lauber, President
Harrison Paint Company
1329 Harrison Ave. SW
Canton, OH 44706

Dear Mr. Lauber:

Thank you for your response, dated April 27, 2012 and received on April 30, 2012, to my March 21, 2012 Notice of Violation (NOV) letter and my Partial Return to Compliance (PRTC) letter dated April 17, 2012.

The documentation you submitted in your April 27, 2012 letter included: changes to the facility personnel training plan to train an additional person and documentation of distribution of the facility hazardous waste contingency plan.

For consistency and ease of reference, this letter retains the violation numbers from my NOV letter of March 21, 2012. Please refer to that letter for additional details of the violations cited.

My review of the documentation submitted in your April 27, 2012 letter indicates that Harrison Paint has adequately demonstrated abatement of the following violation from the March 7, 2012 inspection cited in my NOV letter of March 21, 2012, specifically:

3. OAC Rule 3745-65-16 Personnel training.

The status of the other violations from the March 7, 2012 inspection cited in my NOV letter of March 21, 2012, is reviewed below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT VIOLATION

1. ORC 3734.02(E) & (F) Facility must be permitted for treatment, storage, disposal

Although no further action is being required by Ohio EPA at this time, be advised that due to the nature of the violation, Ohio EPA may require closure pursuant to OAC rules 3745-55-11 through 3745-55-20 and OAC rules 3745-55-42 through 3745-55-47 at this site. My PRTC letter of April 17, 2012, did not clearly state the potential closure obligation as the discussion in that letter could have been read to state that Ohio EPA might complete the closure.

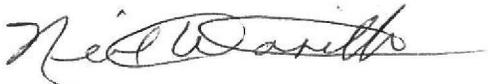
VIOLATIONS FOR WHICH HARRISON PAINT WAS PREVIOUSLY RETURNED TO COMPLIANCE

Harrison Paint was previously returned to compliance for the following violations from the March 7, 2012 inspection in my PRTC letter dated April 17, 2012:

- 2. Content of contingency plan, OAC 3745-65-52 (A), (B) and (C):**
- 4. OAC Rule 3745-52-34(A) (2) & (3) Accumulation time of hazardous waste**
- 5. OAC Rule 3745- 66-74 Weekly Inspections of Hazardous Waste Containers**
- 6. OAC Rule 3745-65-33 Testing and maintenance of equipment.**
- 7. OAC Rule 3745 52 34 (C)(1)(b) Satellite Accumulation of hazardous waste.
OAC Rule 3745 52 34 (C)(1)(a) Satellite Accumulation of hazardous waste.**
- 8. OAC 3745-273-14(E) Small Quantity Handler Must Label the Unit Holding Universal Waste Lamps
OAC 3745-273-13(D)(1) Small quantity handler must contain lamps in proper containers or packaging and containers or packaging must be closed.**

Should you have any questions regarding this letter, please contact me at (330) 963-1165.

Sincerely,



Neil J. Wasilk
Environmental Specialist
Division of Materials and Waste Management

NJW:ddw

cc: Marlene Kinney, Ohio EPA, DMWM, NEDO
ec: Natalie Oryshkewych, Ohio EPA, DMWM, NEDO
Nyall McKenna, Ohio EPA, DMWM, NEDO
Jeff Mayhugh, Ohio EPA, DMWM, CO