



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 14, 2007

Ms. Allison Knowles
Von Roll America, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: VON ROLL AMERICA, INC., COLUMBIANA COUNTY, OHD 980 613 541 HWFB
NO. 02-15-0589, RCRA LQG/TSD INSPECTION
SEPTEMBER 2006 COMPLIANCE EVALUATION INSPECTION**

Dear Ms. Knowles:

On September 26, 2006, the Ohio Environmental Protection Agency (EPA) conducted a semi-annual compliance evaluation inspection (CEI) of the Von Roll America (VRA), Inc. facility in East Liverpool, Ohio. During the CEI, Ohio EPA observed three violations of Ohio's hazardous waste laws and regulations and several concerns which were outlined in a notice of violation (NOV) dated November 8, 2006.

VRA responded to the NOV in a letter dated December 7, 2006. As a result of information provided by VRA in the December 7, 2006 letter and verbally during telephone calls and meetings, Ohio EPA issued a return to compliance letter (RTC) to VRA. The RTC was dated January 11, 2007. In addition to abating the violations noted in the NOV, VRA also provided information requested regarding the concerns observed during the CEI. There were several issues that Ohio EPA will continue to monitor closely, namely: (1) the facility's waste management practices; (2) practices associated with completing inspection reports; and (3) waste scheduling procedures associated with maintenance and repair outages of the incineration system.

Ohio EPA also requested additional information regarding the management of lab pack wastes. Specifically, lab packs auditing prior to storage and, that all lab packs to be audited, are audited within fourteen (14) days of receipt. Ohio EPA inquired into the notification and tracking procedures.

VRA provided the requested information during the VRA/Ohio EPA monthly meeting held on February 22, 2007. VRA informed Ohio EPA that a report of lab pack waste is generated weekly. VRA personnel review the status of the lab pack waste, and if and when a lab pack approaches 14 days without being audited, the Environment, Health, and Safety (EHS) Department is notified. EHS then investigates and if necessary, contacts Ohio EPA to notify the Agency of the problem. This same report is able to track the location of the lab pack waste and ensure that lab packs are not put into storage prior to being audited.

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This letter is in reference to Ohio EPA's request for information in the January 11, 2007 RTC letter. As noted above, the information was provided which closes out this final concern. At this point, all issues, violations as well as concerns, associated with the September 2006 CEI have been addressed.

If you have any questions, please do not hesitate to contact me at the Ohio EPA field office in East Liverpool at (330) 385-8447 or the Northeast District Office at (330) 963-1279. Or you may contact my supervisor, Frank Popotnik at (330) 963-1198. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Patricia M. Natali
Environmental Specialist
Division of Hazardous Waste Management

PMN:ddw

Enclosure

cc: Frank Popotnik, DHWM, NEDO
Michelle Tarka, DHWM, NEDO
Tammy McConnell, DHWM, CO
Harry Sarvis, DHWM, CO
Will Damico, Region V, USEPA
Natalie Oryshkewych, DHWM, NEDO

Keywords: CEI, Fall 2006, final

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve VRA from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve VRA from liability for any past or present violations of the state's hazardous waste laws.