



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

January 28, 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andy Adams
Senior Counsel, Environmental Health & Safety
Koch Companies Public Sector LLC
4111 East 37th Street North
Wichita, Kansas 67220

**RE: *CARDINAL PUMPS & EXCHANGERS INC. / SALEM, OHIO FACILITY, CESQG
OHD 982 644 239, COLUMBIANA COUNTY, VOLUNTARY AUDIT DISCLOSURE
DISCLOSURE NUMBER 09-04, RETURN TO COMPLIANCE***

Dear Mr. Adams:

On August 31, 2009, Cardinal Pumps and Exchangers, Inc (Cardinal) submitted a Voluntary Audit Disclosure (VAD) letter to Director Korleski, indicating that Cardinal was out of compliance with Ohio EPA's Cessation of Regulated Operations regulations by failing to submit the required notifications and documentation. On December 16, 2009, Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted an Audit Disclosure Investigation on December 16, 2009 at the former Cardinal facility located at 1332 Salem Parkway in Salem, Ohio. Cardinal ceased regulated operations on March 1, 2007, but failed to notify Ohio EPA. The facility currently houses Hickey Metal Fabricators which does not generate any hazardous waste and is operated by the property owner, Robert Hickey. The purpose of this inspection was to investigate the information submitted in Cardinal's VAD letter and to observe areas of the facility where Cardinal had stored regulated materials in tanks, which had been cleaned and removed. Cardinal was represented by you (Koch Chemical Technology Group, LLC) and Tab Shaffer (former Plant Manager), while Ohio EPA was represented by me. Mr. Hickey also joined us to answer any questions regarding the building or property.

By e-mail dated January 8, 2010 Cardinal submitted documentation requested by Ohio EPA, including the Permanent CRO 30/45 Day Form and the Regulated Substance & Equipment Removal 90 Day Final Form. Cardinal also submitted the following documentation:

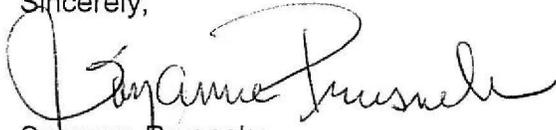
- Attachment A1 – a copy of the Tier Two emergency and hazardous chemical inventory dated March 1 2007.
 - A layout of the facility showing the previous location of the oil tank, dated Feb. 20, 2004.
 - A copy of the SERC Facility Annual Chemical Inventory Filing Fee Worksheet dated March 1, 2007.
- Attachment A2 – A statement from Cardinal regarding asbestos at the facility.
- Attachment B1 to B6 – An MSDS for the Shell Diala A insulating oil stored on site while the facility was operating.
- Attachment C1 – A facility diagram showing the locations of the petroleum drum storage and transformer oil tank.
- Attachment C2 – a photograph of the former transformer oil tank.
- Attachment D – A brief narrative regarding the management and destination of the Transformer Oil Tank and the Petroleum In equipment and containers on site, including a copy of a receipt for the draining and cleaning of the tank.

CARDINAL PUMPS & EXCHANGERS INC.
JANUARY 28, 2010
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My review of this documentation reveals that Cardinal has abated all violations voluntarily reported to Ohio EPA in the August 31, 2009 VAD. Ohio EPA hereby returns Cardinal to compliance.

If you have any questions or comments, please feel free to contact me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

Enclosure

cc: Todd Anderson, Legal, CO
Cheryl Fields, Directors Office, CO
April Bott, Bott Law Group LLC
ec: Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
Keith Riley, Assistant Chief, NEDO
Frank Popotnik, DHWM, NEDO

Send to Central Office X	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD982644239							
Site Name	Name: Hickey Metal Fabricators					Website: (Optional)		
Site Location Information	Street Address: 1332 Salem Pkwy							
	City, Town, or Village: Salem				State: OH			
	County Name: Columbiana				Zip Code: 44460			
Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other
	X	<input type="checkbox"/>						
NAICS code(s) www.census.gov/epcd/www/naics.html								

Facility Representative	First Name: Robert		MI:	Last Name: Hickey	
Additional names can be recorded in number 12	Phone Number: 330-337-9329			Phone Number Extension:	
Only provide address information if it is different than the site address	E-Mail Address: N/A				
	Fax Number: N/A			Fax Number Extension:	
	Street or P.O. Box: Same				
	City, Town or Village:			Zip Code:	
	State:			Zip Code:	

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	Name of Site's Legal Owner: Robert Hickey				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		X	<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: Same				Owner Phone #: Same				
	City, Town or Village: Same				Country:		Zip Code:		
	State:				Country:		Zip Code:		
	Name of Site's Operator: Hickey Metal Fabricators				Date Became Operator (mm/dd/yyyy):				
	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		X	<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: Same				Operator Phone #: Same				
	City, Town or Village: Same				Country:		Zip Code: Same		
	State: OH				Country:		Zip Code: Same		

VIOLATIONS CITED?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input checked="" type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
		<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	

**UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED
(CHECK ALL BOXES THAT APPLY)**

Small Quantity Handler of Universal Waste Destination Facility for Universal Waste
 Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more)

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
 Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives:
Tanks Yes No
Containers Yes No

Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Suzanne Prusnek		December 16, 2009 10:00

Comments:
Please deactivate EPA ID# per the facility's request.