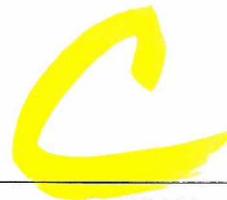




State of Ohio Environmental Protection Agency

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

March 3, 2008

RE: MASTER CHROME SERVICES  
CEI - LQG  
OHD 987 040 326  
CUYAHOGA COUNTY  
NOTICE OF VIOLATION

Michael Rowe  
Master Chrome Services  
3709 Herman Ave. NW  
Cleveland, OH 44102

**CERTIFIED MAIL**

Dear Mr. Rowe:

On February 13, 2008, Ohio EPA, represented by Ed D'Amato/DHWM-NEDO, inspected Master Chrome Services for compliance with Ohio hazardous waste laws and regulations found in Chapters 3734 of the Ohio Revised Code (ORC) and 3745 of the Ohio Administrative Code (OAC)

You represented Master Chrome Services during the inspection.

Master Chrome Services is a hardchrome plating facility.

This letter will explain the violations we found, other general concerns we have, and what you need to do to respond to them. We found the following violations of Ohio's hazardous waste regulations. In order to correct them you must do the following and send me all requested information **within 30 days** of the date of this letter:

**1. Labeling of Hazardous Waste Container Labels  
OAC 3745-52-34 (A)(2)**

*(A)(2) A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on site, provided that...The date upon which each period of accumulation...begins is clearly marked and visible for inspection on each container*

There were seven drums of lead chromate waste in the hazardous waste accumulation area. None of the hazardous waste labels included the accumulation date. To abate this violation, you must properly date the containers, photograph them, and send the photographs to this office.

**2. Unlawful Treatment, Storage, Disposal, or Transportation of Hazardous Waste ORC 3734.02(F)**

*No person shall store, treat, or dispose, transport or cause to be transported, regardless of whether generated on or off the premises where the waste is stored, treated, or disposed, any hazardous waste except at or to a permitted hazardous waste facility*

At the time of the inspection, there were seven drums of lead chromate waste in the hazardous waste accumulation area. Six of the drums were full. The seventh was about 1/2 full. You explained that you were still accumulating waste in the seventh drum. Since March 30, 2005, Master Chrome has accumulated 6 drums of lead chromate waste in violation of this rule. You must immediately dispose of these six drums. You must submit copies of the disposal paperwork to this office.

**3. Emergency Equipment Inspections**  
**OAC 3545-65-33**

*All communication and emergency equipment shall be tested and maintained as necessary to assure proper operation in time of emergency*

Master Chrome Services is not conducting emergency equipment inspections. To abate this violation, you must immediately begin conducting emergency equipment inspections and send a copy of the inspection log to this office that shows at least one actual inspection has been completed.

**4. Universal Waste Management Standards—Containers**  
**OAC 3745-13(D)**

*A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage...such containers must be kept closed and must lack evidence of leakage, spillage or damage*

Master Chrome Services had at least 3 boxes of fluorescent lamps that were not packaged per this rule. The boxes were not closed and at least two of them contained lamps that were too big for the boxes in which they were contained. To abate this violation, you must properly package the lamps, photograph them, and submit the photographs to this office.

**5. Personnel Training**  
**OAC 3745-65-16(A)(1) and (A)(2)**

*(A)(1) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste requirements*

*(A)(2) [Personnel training] shall include instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed*

In 2006, Master Chrome Services notified Ohio EPA that it was a large quantity generator for 2006. You did not have any records showing that Charles Rowe or Todd Murphy have received training per this rule. You explained that Charles Rowe will conduct weekly inspections in your absence and one of Todd Murphy's responsibilities is moving hazardous waste drums. To abate this violation, you must provide training to these employees. To abate this violation, you must submit an outline of the training you provided them and documentation that they completed the training.

The following Ohio EPA fact sheets may be helpful to you:

Hazardous Waste Generator Categories and Episodic Generation:  
[http://www.epa.state.oh.us/dhwm/pdf/Episodic\\_Generation.pdf](http://www.epa.state.oh.us/dhwm/pdf/Episodic_Generation.pdf)

Commercial Facilities Accepting Hazardous Waste in Ohio:  
<http://www.epa.state.oh.us/dhwm/pdf/accepting.pdf>

MASTER CHROME SERVICES  
MARCH 3, 2008  
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You may be able to reduce operating costs with waste minimization/pollution prevention practices. The Ohio EPA offers pollution prevention assessments to help you decide which practices would benefit your operations. If you would like to have a pollution prevention assessment, or would like more information, please contact Adrienne LaFavre at (330) 963-1250. The Office of Compliance Assistance and Pollution Prevention website at <http://www.epa.state.oh.us/ocapp/ocappmain.html> is also a good source of information.

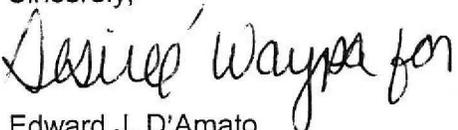
You explained that Master Chrome Services is considering installing new, energy efficient lighting fixtures. For information about energy efficient lighting and other potential energy saving opportunities, the Ohio Department of Development, Office of Energy Efficiency is a good source of information:

[http://www.odod.state.oh.us/cdd/oeec/c\\_i\\_services.htm](http://www.odod.state.oh.us/cdd/oeec/c_i_services.htm)

Failure to list specific deficiencies in this communication does not relieve Master Chrome Services from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Enclosed is a copy of the checklist used for the inspection. Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato  
Environmental Specialist  
Division of Hazardous Waste Management

EJD:ddw

Enclosures

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