



Environmental
Protection Agency

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

August 14, 2012

Mr. Mike Smiley, Plant Manager
Core Systems, LLC
420 Douglas Street
Mt. Gilead, OH 43338

**RE: Core Systems, LLC
Non-Notifier
Complaint Investigation
Notice of Violation & Return-to-Compliance**

Dear Mr. Smiley:

On June 22, 2012, Ohio EPA received an anonymous complaint regarding the Core Systems, LLC (CS) facility located at 420 Douglas Street, Mt. Gilead, OH in Morrow County. The anonymous complainant alleged an unknown oil was spilling onto the ground from totes and that there are materials stored that cause a toxic release when the materials come into contact.

On August 7, 2012, I went to the CS facility and met with you and Mr. Mark Reynolds and conducted a thorough investigation. We discussed the complaint allegations and reviewed facility operations and associated documentation. Based on the results of this investigation, it has been determined that CS violated the following used oil rule, as found in Chapter 3745 of the Ohio Administrative Code (OAC):

OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements for Generators:
Containers and aboveground tanks used to store used oil at generator facilities must be labeled or clearly marked with the words "Used Oil."

Totes (~300 gallons each) of used oil located at the rear of the facility on a concrete area were not labeled as required at the time of the investigation. On this same day and in my presence, all totes of used oil were appropriately labeled. None of these totes of used oil were found to be leaking.

No further action regarding this violation is necessary at this time and CS is also returned to compliance with this letter.

As we discussed, please find enclosed the following documents for your review:

- *Fluorescent Lamps: What You Should Know (January 2007);*
- *Recyclers and Environmental Service Providers - Lamp Recyclers in Ohio;*
- *Solvent Contaminated Wipers;*
- *Ask the Inspector: May I throw my used oil filters in the trash?*
- *Recyclers and Environmental Service Providers – Oil Filter Recycling and Transportation Services;*
- *Universal Waste (August 2011);*
- *Management of Electronic Waste from Businesses;*
- *Aerosol Can Questions;* and
- **Aerosol can recycling equipment (not an endorsement, only an example).**

Should you have any questions or need additional information, I can be reached by telephone at 614-728-5037. You may also be able to find other helpful information on Ohio EPA's web page which can be found at: <http://www.epa.state.oh.us/>.

NOTICE: Ohio EPA's failure to list specific violations or deficiencies in this letter does not relieve CS from having to comply with all applicable rules and regulations.

Respectfully,



Randy Sheldon
Environmental Specialist
Division of Materials and Waste Management
Central District Office

Enclosures

c: Brad Hauser, DMWM, CO w/o enclosures
DMWM, CDO File w/o enclosures

COMPLAINT INVESTIGATION – FIELD ACTIVITY REPORT

On June 22, 2012, an anonymous complaint was forwarded through Ohio EPA's spill hot-line representative, Greg Lauck, to me that had originated from the U.S. EPA spill hot-line. The anonymous complainant indicated that Core Systems, located at 420 Douglas Street, Mt. Gilead, OH 43338, was spilling an unknown oil onto the ground from totes. The complainant also reported that there are materials stored that cause a toxic release when the materials come into contact.

Upon receipt of this complaint, I called Mr. Joe Edwards, Morrow County EMA/Homeland Security director. Mr. Edwards said he was well aware of the Core Systems facility and reported that he did not know of any active releases and/or sloppy operations ongoing at the location. The facility has not requested receipt of a hazardous waste generator identification number (not required).

On August 7, 2012, I went to the Core Systems facility and spoke with Mr. Mike Smiley (Plant Manager) and Mr. Mark Reynolds (Master Mechanic) about facility operations. It was reported that there are two (2) manufacturing facilities in Ohio (Painesville & Mt. Gilead). Core Systems is reported to be a "total solutions provider" for the injection molding industry. The Mt. Gilead factory specializes in plastic parts which are supplied to industries such as Whirlpool, Bosch, and Big John. It was also reported that two (2) individuals had recently been relieved from duties and OSHA had already been to the facility for an investigation and reportedly found no irregularities.

No painting is done at this facility. Injection molding machines and associated equipment are serviced on-site. A small facility maintenance shop is located within the facility. A ZEP parts cleaner, which contains 143 degree F flash solvent, is serviced/managed by ZEP. Aerosol cleaners/degreaser products are also used by the maintenance staff. Machine oils are accumulated in ~300 gallon totes and are stored at the rear of the property on concrete while awaiting off-site recycling for eventual reuse. These containers of used oil were found to be closed and not leaking, but were not labeled with the words "used oil," as required. These containers were appropriately labeled in my presence on the day of the investigation.

We also discussed management of aerosol cans, spent wipers, spent light bulbs and other universal wastes, electronic/computer equipment, and used oil filters. I said I would provide documentation associated with the applicable/best management practices available for these items.

The complaint was determined to be unfounded.

Send to Central Office <input type="checkbox"/>	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 brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number:		Website: (Optional)					
Site Location Information	Name: Core Systems LLC		Street Address: 420 Douglas Street					
Site Land Type (check only one)	City, Town, or Village: Mt Gilead		State: OH					
NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Morrow		Zip Code: 43338					
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>

Facility Representative Additional names can be recorded in number 12. Only provide address information if it is different than the site address	First Name: Mike		MI:	Last Name: Smiley	
	Title: Plant Manager		Phone Number: 419-946-2020		Phone Number Extension:
	E-Mail Address:				
	Fax Number:		Fax Number Extension:		
	Street or P.O. Box: 420 Douglas Street				
	City, Town or Village: Mt Gilead				
	State: OH		Zip Code: 43338		

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: Core Systems LLC		Date Became Owner (mm/dd/yyyy): 10/09/1997							
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box: 420 Douglas Street					City, Town or Village: Mt Gilead				
	State: OH		Owner Phone #: 419-946-2020			Country: USA		Zip Code: 43338		
	Name of Site's Operator: Core Systems LLC		Date Became Operator (mm/dd/yyyy): 10/09/1997							
	Operator Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	Street or P.O. Box: 420 Douglas Street					City, Town or Village: Mt Gilead				
	State: OH		Operator Phone #: 419-946-2020			Country: USA		Zip Code: 43338		

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input 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"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input checked="" 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"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> 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 Used Oil
- Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
- Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

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 RCRA Info 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 | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: |
| Tanks | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | |

Name of Inspector(s)
R Sheldon

Name of Inspector(s)

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
08/07/2012 11:30 am

Comments:

Only used oil was found to be in accumulation at the time of this complaint investigation. Hazardous waste may be generated in very small quantities during maintenance activities.