



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

May 31, 2013

Lorie Webb
 Manager, Information Services and Purchasing
 Aexcel Corporation
 7373 Production Dr.
 Mentor, OH 44060

RE: AEXCEL CORPORATION, OHD986970622, LAKE COUNTY, RTC

Dear Ms. Webb:

On April 19, April 22, May 2 and May 23, 2013, I received Aexcel Corporation's (Aexcel) responses to Ohio EPA's April 5, 2013 Notice of Violation/Partial Return to Compliance (NOV/PRTC) letter. The following is the status of the unaddressed violations from Ohio EPA's April 5, 2013 NOV/PRTC letter:

Letter Citation #	Rule Citation
4.	OAC rule 3745-65-16(C) and OAC rule 3745-65-16(D)(4): Aexcel's April 19 and May 23 responses included documentation that facility personnel received training on April 17 and May 6, 2013. This violation has been adequately addressed. No further response is requested.
5.	OAC rule 3745-65-31, Maintenance and Operation: Aexcel's April 19 and May 23 responses included documentation that facility personnel received training on the facility's Procedure for Disposal of Empty Metal Containers on April 17 and May 6, 2013. This violation has been adequately addressed. No further response is requested.
9./10./11.	Waste Evaluation, OAC rule 3745-52-11 / Manifest Requirements, OAC rule 3745-52-20(A)(1) / Labeling and Marking of Containers, OAC rule 3745-52-31 and OAC rule 3745-52-32: Aexcel's April 19 and May 23 responses included documentation that facility personnel received training on the facility's Procedure for Managing and Evaluating Wastes on April 17 and May 6, 2013. This violation has been adequately addressed. No further response is requested.

AEXCEL CORPORATION
MAY 31, 2013
PAGE – 2 –

Ohio EPA offers the following comment:

- Aexcel's April 22, 2013 response included a copy of the analytical results for the waste caustic cleaner and baghouse dust. Aexcel's May 2, 2013 response indicated that the waste caustic cleaner will be managed as a D002 corrosive hazardous waste.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Materials and Waste Management

FAZ:ddw

ec: Natalie Oryshkewych, DMWM, NEDO
Frank Popotnik, DMWM, NEDO
Jeff Mayhugh, DMWM, CO
cc: Marlene Kinney, DMWM, NEDO