



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

Re: Continental Structural Plastics
Wyandot County
OHD 052 323 581
Hazardous Waste
Return to Compliance

August 8, 2013

Ms. Jessica Coleman, Environmental Manager
Continental Structural Plastics
2915 County Road 96
Carey, Ohio 43316

Dear Ms. Coleman:

Thank you for your July 29, 2013, response to Ohio EPA's July 10, 2013, Notice of Violation/Partial Return to Compliance (NOV-PRTC) letter. Continental Structural Plastics (CSP) located at 2915 County Road 96 in Carey, Ohio, submitted contingency plan updates and satellite area container documentation. My review of the documentation submitted reveals that CSP has adequately demonstrated abatement of all of the violations cited in the July 10, 2013, NOV-PRTC.

The following is a summary of the violations cited in the July 10, 2013, NOV-PRTC as a result of Ohio EPA's June 27, 2013, inspection and your compliance with respect to each:

1. OAC Rule 3745-65-52(D): Contingency Plan:

The generator must have a contingency plan that includes a current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator.

CSP failed to have the home addresses and telephone numbers listed for the emergency coordinators designated in the plan.

On July 29, 2013, CSP submitted a copy of the updated page for the contingency plan that now lists the home address and telephone for the emergency coordinators.

With this information, this violation has been abated.

2. OAC Rule 3745-52-34(C)(1)(a), Container Management:

A container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste.

CSP had one open satellite container located in the paint kitchen. The 5-gallon bucket used to catch incidental drips from the product solvent drum was also being used as a satellite container for waste paint solvent. CSP stated that they do not intend to continue to use the 5-gallon bucket as a satellite accumulation container.

On July 29, 2013, CSP submitted photographic documentation of the product solvent drum drip bucket now in place. The new drip bucket is labeled "MAK Drip Bucket". In addition, CSP conducted training on July 26, 2013, for the paint technicians to ensure that the drip bucket is not used as a hazardous waste satellite accumulation container.

With this information, this violation has been abated.

3. OAC Rule 3745-52-34(C)(1)(b), Satellite Accumulation Areas:

A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit provided the containers are marked "Hazardous Waste" or other identifying words of the container's contents.

CSP had one satellite container located in the paint kitchen that was not properly labeled "Hazardous Waste" or other identifying words at the time of the inspection.

The 5-gallon bucket used to catch incidental drips from the product solvent drum was also being used as a satellite container for waste paint solvent. CSP stated that they do not intend to continue to use the 5-gallon bucket as a satellite accumulation container.

On July 29, 2013, CSP submitted photographic documentation of the product solvent drum drip bucket now in place. The new drip bucket is labeled "MAK Drip Bucket". In addition, CSP conducted training on July 26, 2013, for the paint technicians to ensure that the drip bucket is not used as a hazardous waste satellite accumulation container.

With this information, this violation has been abated.

4. OAC Rule 3745-52-34(A)(2), Container Management:

A generator may, for ninety days or less, accumulate and/or conduct treatment of hazardous waste that is generated on-site without an Ohio hazardous waste permit provided that the waste is placed in containers that have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container.

CSP had three 55-gallon drums of spent line flush reclaim solvent (D001) located in the outside hazardous waste storage area that did not have accumulation start dates.

This violation was previously abated on June 27, 2013.

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5. OAC Rule 3745-279-22(C)(1): Labeling:

Containers, aboveground tanks, and fill pipes used for underground storage tanks shall be labeled or marked clearly with the words "used oil."

CSP had one 5-gallon bucket and two drip pans located in the oil recycling area that was not properly labeled.

This violation was previously abated on June 27, 2013.

Ohio EPA has helpful information about compliance assistance and pollution prevention at the following web address: <http://www.epa.ohio.gov/ocapp>. In addition, you can find copies of the rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

If you have any questions or I can be of assistance, please contact me at (419) 373-3066.

Sincerely,



Melissa L. Boyers
Division of Materials and Waste Management

/cg

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; Colleen Weaver, DMWM, NWDO

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Notice:

Ohio's EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.