

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter of:

The Cornwell Quality Tools Company
200 North Cleveland Avenue
Mogadore, Ohio 44260

**Director's Final
Findings and Orders**

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to The Cornwell Quality Tools Company (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 3734.13 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or of the Facility shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3734. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent is a "person" as defined in ORC § 3734.01(G) and Ohio Administrative Code (OAC) rule 3745-50-10(P).
2. Respondent operates a business that finishes forged tools through machining, polishing, and chrome plating located at 200 North Cleveland Avenue, Mogadore,

Ohio (Facility). The Facility has been assigned U.S. EPA identification number OHD039454798.

3. At the Facility, Respondent generates "hazardous waste" as that term is defined by ORC §3734.01 and OAC rules 3745-50-10(H) and 3745-51-03. Respondent generates non-acute hazardous waste in amounts greater than 100 kilograms but less than 1000 kilograms per calendar month and therefore is operating as a "Small Quantity Generator" (SQG) of hazardous waste, as defined in OAC rule 3745-50-10(S), subject to the requirements in OAC Chapter 3745-52.
4. At the Facility, Respondent generates characteristic hazardous wastes, including but not limited to, hazardous waste sodium hydroxide which exhibits the characteristic of corrosivity (D002) as defined in OAC rule 3745-51-22 and hazardous waste filter cake which is a listed hazardous waste due to toxicity (F006) as defined in OAC rule 3745-51-31.
5. On October 20, 2025, Ohio EPA received an unmanifested waste report indicating Respondent transported two 55-gallon containers of hazardous waste sodium hydroxide to a facility not authorized to receive hazardous waste from off-site on October 6, 2025. The hazardous waste sodium hydroxide was identified to be a corrosive hazardous waste (D002) upon arrival and was transported with a hazardous waste manifest to an authorized hazardous waste facility for final disposal on October 17, 2025.
6. On January 22, 2026, Ohio EPA conducted a focused compliance inspection (FCI) of the Facility. As a result of this FCI, and the information referenced in Finding No. 5. of these Orders, Ohio EPA determined that Respondent, *inter alia*:
 - a. Failed to evaluate two 55-gallon containers of hazardous waste sodium hydroxide (D002), in violation of OAC rule 3745-52-11.
 - b. Caused two 55-gallon containers of hazardous waste sodium hydroxide (D002) to be transported to a facility not authorized to receive hazardous waste, in violation of ORC 3734.02(F) and OAC rule 3745-52-10(A)(3).
 - c. Failed to transport hazardous waste on a hazardous waste manifest, in violation of OAC rule 3745-52-20(A).
 - d. Established and operated the Facility as a hazardous waste storage facility without a hazardous waste installation and operation permit, in violation of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A). Specifically, Respondent stored at least one, one-cubic yard container of hazardous waste filter cake (F006) for greater than 180 days in

the central accumulation area (CAA). The container was stored at a minimum for one year at the Facility.

- e. Failed to label one, one-cubic yard container of hazardous waste filter cake (F006) in the CAA with the accumulation start date in violation of OAC rule 3745-52-16(B)(6)(a)(iii).
 - f. Failed to label one satellite accumulation container of hazardous waste filter cake (F006) with the words "hazardous waste" in violation of OAC rule 3745-52-15(A)(5)(a).
 - g. Failed to label one satellite accumulation container of hazardous waste filter cake (F006) with an indication of the hazards of the contents in violation of OAC rule 3745-52-15(A)(5)(b).
- 7. On February 11, 2026, Respondent submitted to Ohio EPA a hazardous waste manifest for the hazardous waste filter cake (F006) referenced in Findings Nos. 6.d. and 6.e. of these Orders documenting the transportation to an authorized facility on February 9, 2026.
 - 8. On February 12, 2026, Respondent submitted to Ohio EPA photographs of the hazardous waste filter cake (F006) satellite accumulation container referenced in Findings Nos. 6.f. and 6.g. of these Orders properly labeled.
 - 9. By letter dated March 3, 2026, Ohio EPA notified Respondent of the violations referenced in Finding No. 6. of these Orders and that based upon the information referenced in Findings Nos. 5., 7., and 8. of these Orders, the violations referenced in Findings Nos. 6.a., 6.c., 6.e., 6.f., and 6.g. of these Orders have been resolved.
 - 10. Because the mismanaged hazardous wastes referenced in Finding No. 5. of these Orders were ultimately managed at an authorized facility, the Director has determined that no further action is required of Respondent to resolve the violations of ORC § 3734.02(F) and OAC rule 3745-52-10(A)(3) referenced in Finding No. 6.b. of these Orders.
 - 11. Because the unlawfully stored container of hazardous waste was in good condition and there was no evidence of releases of hazardous waste observed where the hazardous waste was unlawfully stored in the CAA as referenced in Finding No. 6.d. of these Orders, the Director has determined that no further action is required of Respondent to resolve the violations of ORC § 3734.02(E) and (F) and OAC rules 3745-50-41(A) and 3745-50-45(A) referenced in Finding No. 6.d. of these Orders.

V. ORDERS

Respondent shall achieve compliance with Chapter 3734. of the ORC and the regulations promulgated thereunder according to the following compliance schedule:

1. Within 30 days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of \$6,400.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734. and which will be deposited into the environmental protection remediation fund established pursuant to ORC § 3734.281. The official payment shall be submitted to Ohio EPA according to the instructions on the invoice. Notification of penalty payment shall be sent to the Hazardous Waste Program Compliance Assurance Manager, Ohio EPA, Division of Environmental Response and Revitalization, P.O. Box 1049, Columbus, Ohio 43216-1049 or via electronic mail at Mitchell.Mathews@epa.ohio.gov.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate upon Ohio EPA's receipt of the official payment required by Section V. of these Orders.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the operation of Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents (except penalty payment checks) required to be submitted by Respondent pursuant to these Orders shall be addressed to Mitchell.Mathews@epa.ohio.gov.

XI. RESERVATION OF RIGHTS

Ohio EPA reserves its rights to exercise its lawful authority to require Respondent to perform closure and corrective action at the Facility at some time in the future, pursuant to ORC Chapter 3734. or any other applicable law. Respondent reserves its rights to raise any administrative, legal, or equitable claim or defense with respect to any final action of the Director regarding closure or corrective action. Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Except for the right to seek closure and corrective action at the Facility, which rights Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

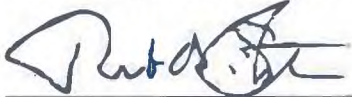


John Logue
Director

8-14-2026

IT IS SO AGREED:

The Cornwell Quality Tools Company



Signature

8/12/2026

Date

Robert A. Studenic

Printed or Typed Name

PRESIDENT & CEO

Title