



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 8, 2009

RE: ADVANCED CIRCUITS
LARGE QUANTITY GENERATOR
OHD 098 705 970
LAKE COUNTY
RTC

Mr. J.K. Patel
Advanced Circuits
7266 Commerce Drive
Mentor, Ohio 44060

Dear Mr. Patel:

On April 24 and May 29, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, received Advanced Circuits' response to the Agency's March 19, 2009 Notice of Violation (NOV) letter.

Advanced Circuits documented its intent to comply with the elementary neutralization unit exemption for its spent rinse waters, and submitted a written response to each violation. Based upon the facility's response and its intent to comply with the elementary neutralization unit exemption, the facility appears to conditionally exempt small quantity generator of hazardous waste. If the facility is unable to comply with the exemption in the future, the facility will be required to comply with the large quantity generator requirements and tank system requirements as expressed in the March 19, 2009 NOV letter.

Ohio EPA's review of this documentation reveals that Advanced Circuits has adequately demonstrated abatement of all violations discovered during the March 3, 2009 compliance evaluation inspection:

1. Waste Evaluation, OAC rule 3745-52-11;
2. Waste Evaluation, OAC rule 3745-52-11; and
3. Manifest, OAC rule 3745-52-20(A).

The following violations were abated by complying with the elementary unit exemption:

4. Personnel Training, OAC rules 3745-65-16(A)(1-3), (B), (C), (D)(1-4) and (E);
5. Contingency Plan, OAC rules 3745-65-51(A) and (B); 3745-65-52 (A), (C), (D), (E) and (F); 3745-65-53(A) and (B); and 3745-65-55;
6. Emergency Equipment, OAC rule 3745-65-32(C);
7. Emergency Equipment Inspections, OAC rule 3745-65-33;
11. Hazardous Waste Storage Tank Requirements: OAC rules 3745-66-91 through 66-100;
12. Land Disposal Restriction (LDR), OAC rule 3745-270-07(A)(2);and
13. Unpermitted Storage, ORC §3734.02 (E) and (F).

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The following violations are rescinded since the facility documented the drums of concern did not contain hazardous waste:

8. Labeling, OAC rule 3745-52-34(A)(3);
9. Dating, OAC rule 3745-52-34(A)(2); and
10. Container Inspections, OAC rule 3745-66-74.

Since Advance Circuits violated ORC §3734.02(E) and (F), the facility is subject to all applicable general facility standards found in OAC chapters 3745-54 and 55. Additionally, at any time Ohio EPA may assert its right to have Advanced Circuits begin facility-wide cleanup pursuant to the Corrective Action process under Ohio law.

Should you have any question, please feel free to call me at (330) 963-1278. You can find copies of the rules and other information on the DHWM's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Wade Balsler
District Representative
Division of Hazardous Waste Management

WB:ddw

ec: Nyall Mckenna, DHWM, NEDO