

**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Konecki, Director

August 6, 2010

RE: AUTOMATED PACKAGING SYSTEMS, INC.,
OHT400011433, CUYAHOGA COUNTY
RCRA/CESQG
COMPLIANCE EVALUATION INSPECTION
RETURN TO COMPLIANCE

Paul Banfield
Corporate Safety and Environmental Manager
Automated Packaging Systems, Inc.
25900 Solon Road
Bedford, OH 44146

Dear Mr. Banfield:

Thank you for your August 3, 2010 response to Ohio EPA's July 1, 2010 Notice of Violation (NOV) Letter. You submitted documentation and information including:

- One photograph demonstrating Universal Waste (UW) lamps are being managed in boxes that are closed labeled and dated in order to track how long the lamps have been on site.
- Shipping documentation demonstrating the UW waste lamps which had been on site in excess of one year, had been shipped off site to Environmental Recycling.
- A copy of Automated Packaging's Universal Waste protocol for used lamps.
- A copy of the documentation demonstrating individuals responsible for managing UW lamps have received training in the proper management of universal waste lamps.

My review of this documentation reveals that Automated Packaging Systems has adequately demonstrated abatement of the following hazardous waste violations cited in Ohio EPA's July 1, 2010 NOV letter. You are hereby returned to compliance.

1. **OAC Rule 3745-273-13(D)(1) Universal Waste Lamp Management**
2. **OAC Rule 3745-273-14(E) Labeling/marketing of Universal Waste**
3. **OAC Rule 3745-273-15(C) Accumulation time limits for Universal Waste**
4. **OAC Rule 3745-273-15(A)(B) Accumulation time limits for Universal Waste**
5. **OAC Rule 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste**

Should you have any questions, please feel free to call me at (330) 963-1181.

Sincerely,



Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:ddw

ec: Frank Popotnik, DHWM, NEDO, OEPA
Harry Sarvis, DHWM, CO, OEPA

Failure to list specific deficiencies in this communication does not relieve APS from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve APS from liability for any past or present violations of the state's hazardous waste laws.