



**Environmental  
Protection Agency**

1110 East Aurora Road  
Twinsburg, OH 44087-1924  
330.963.1200

July 27, 2010

RE: VILLAGE OF CUYAHOGA HTS.  
CUYAHOGA COUNTY  
OHR 000 125 195  
CESQG, NOV

Scott Waldemarson  
Village of Cuyahoga Heights  
7201 Canal Road  
Cuyahoga Heights, OH 44125

Dear Mr. Waldemarson:

On July 20, 2010, this writer, representing the Ohio Environmental Protection Agency (Ohio EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection (CEI) at the Village of Cuyahoga Heights Service Center located at 7201 Canal Road, Cuyahoga Heights, Ohio. The facility was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and the rules promulgated thereunder in Chapter 3745 of the Ohio Administrative Code (OAC).

The inspection included a review of the facility's operations, management of wastes, and records. The facility was inspected for the requirements of a conditionally exempt small quantity generator (CESQG) of hazardous waste.

Ohio EPA identified the following violations of Ohio's hazardous waste laws. In order to correct the violations listed below, the facility must do the following and send me the requested information **within 30 days** of the date of this letter.

1. Waste Evaluation. OAC rule 3745-52-11:  
Any person who generates a waste, as defined in OAC rule 3745-51-02, must determine if that waste is a hazardous waste.

The facility failed to evaluate three 55-gallon drums accumulating at the household hazardous waste storage area.

**In order to abate this violation, the facility must evaluate the contents of the drums, submit the results of the evaluation, and indicate how they will be managed.**

2. Used Oil Labeling. OAC rule 3745-279-22(C)(1):  
Containers used to store used oil at generator facilities must be labeled or clearly marked with the words "used oil."

The facility failed to label the following used oil containers:

- (a) Fill pipe for underground used oil storage tank; and
- (b) two drain pans used to collect used oil.

**These violations were abated during the inspection by labeling the containers as “Used Oil.” No further response to this violation is required.**

3. Universal Waste Lamps, OAC rule 3745-273-13(D)(1):  
Containers of universal waste lamps must remain closed.

The facility failed to keep two containers of universal waste lamps closed during accumulation.

**In order to abate this violation, the facility must submit a photograph demonstrating the containers are closed.**

4. Universal Waste Lamps, OAC rule 3745-273-14(E):  
Containers of universal waste lamps must be labeled or marked with the words “universal waste lamps, used lamps, or waste lamps.”

The facility failed to label two containers of universal waste lamps.

**In order to abate this violation, the facility must submit a photograph demonstrating the containers are labeled.**

5. Comment:  
The following technical assistance documents are enclosed for your reference:

- The Regulation of Used Oil;
- Properly Managing Hazardous Waste Containers;
- Identifying Your Hazardous Waste; and
- Universal Waste Rules for Handlers of Lamps.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land, water, and energy. As indicated during the inspection, please feel free to contact me or OCAPP should your facility be interested in these services. OCAPP may be contacted at: 800-329-7518 or <http://www.epa.ohio.gov/ocapp>.

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The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link [http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc\\_serve.php?2=subscriptionpage](http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage).

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. 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.ohio.gov/dhwm>

Sincerely,



Wade Balsler  
District Representative  
Division of Hazardous Waste Management

WB:ddw

Enclosure

ec: Natalie Oryshkewych, DHWM, NEDO  
Nyall McKenna, DHWM, NEDO

**NOTICE:** Ohio 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.