



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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

August 22, 2007

Chuck Lawson  
Sr. Environmental Technician  
ESAB Welding & Cutting Products Inc.  
3325 Middle Road  
Ashtabula, Ohio 44005-0710

**RE: ESAB Welding & Cutting Products Inc.  
OHD 000821454  
Ashtabula County  
RCRA Large Quantity Generator Inspection/Closed Landfill  
Inspection/Notice of Compliance (NOC); Return to Compliance (RTC) for  
Universal Waste Management Requirements**

Dear Mr. Lawson:

On August 8, 2007, Ohio EPA's Division of Hazardous Waste Management (DHWM) conducted a compliance evaluation inspection (CEI) of ESAB Welding & Cutting Products Inc. (ESAB) located at 3325 Middle Road in Ashtabula, Ohio. The purpose of DHWM's inspection was to determine ESAB's compliance with Ohio's hazardous waste laws and rules as adopted under the Ohio Revised Code (ORC) Chapter 3734 and Chapter 3745 of the Ohio Administrative Code (OAC). Ohio EPA was represented by this writer. ESAB was represented by you and George Gilbert.

Enclosed is a copy of the following documents: the RCRA Subtitle C Site Identification/Verification Form and the RCRA Hazardous Waste Generator Inspection Checklist.

As requested, enclosed is information on the regulatory requirements of a Small Quantity Generator of hazardous waste.

Based upon the information gathered during this inspection, the following represents Ohio EPA's findings:

During this inspection Ohio EPA found no violations of Ohio's hazardous waste rules.

During the previous inspection of June 12, 2007, ESAB was found in violation of the following universal waste management requirements: OAC 3745-273-13(D)(1), Containers or packages of spent lamps must remain closed; and, OAC 3745-273-14(E), Containers or packages of spent lamps are to be labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

Chuck Lawson  
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On August 10, 2007, Ohio EPA received information from you via e-mail showing that the violations have been corrected and/or addressed satisfactorily.

In addition, on August 14, 2007, Ohio EPA received your letter via e-mail regarding your response to the Ohio EPA's concerns as addressed to Mr. Beckwith in the June 27, 2007 inspection report. I am forwarding your letter to Kevin Palombo, Division of Ground Water, for his review. If he has any questions or requires additional information regarding your response, we will let you know.

Thank you for your cooperation in this matter. If you have any questions, please call me at (330) 963-1266.

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

Sincerely,



Kris L. Coder  
Environmental Specialist  
Division of Hazardous Waste Management

KLC:cl  
Enclosure

cc: George W. Gilbert, ESAB, Plant Manager, w/o attachments

ec: Natalie Oryshkewych, DHWM, NEDO  
Harry Sarvis, DHWM, CO  
Kevin Palombo, DDAGW, NEDO