



State of Ohio Environmental Protection Agency

Northeast District Office

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 29, 2009

Thomas Edmunds
Process Engineer
1960 E. 65th Street
Cleveland, OH 44103

**RE: MANUFACTURERS PLATING (MPC), OHD004220372 – LQG, OHR000130542 - SQG
CUYAHOGA COUNTY, RCRA, COMPLIANCE EVALUATION INSPECTION
RETURN TO COMPLIANCE**

Dear Mr. Edmunds:

Thank you for your April 9, 2009 response to Ohio EPA's March 10, 2009 Notice of Violation (NOV) letter. You submitted information and documentation, including:

- Five (5) color photographs demonstrating the Universal Waste (UW) Lamps are being managed, in both MPC and MPC Plating #2, in containers that are closed, labeled as universal waste lamps and dated with an accumulation start date.
- A copy of the protocol for the management of UW lamps, titled "Procedure for Handling Universal Waste Lamps", signed and dated by the employees involved in the management of UW lamps at both of the MPC facilities.
- A copy of job titles and descriptions for positions which manage hazardous waste and a list of employees which fill each position.
- A list of topics covered in the Annual RCRA training.
- Copies of the RCRA annual refresher training records for 2009, signed and dated by each employee receiving the training and by the trainer performing the training.
- A copy of analytical data (TCLP) for the buffing waste generated at MPC Plating #2, dated April 6, 2009, demonstrating the buffing waste to be a non-hazardous waste.

By e-mail dated April 24, 2009, Ohio EPA received the following documentation:

- RCRA annual refresher training record for Tom Edmunds dated April 24, 2009.

My review of this documentation reveals that MPC and MPC Plating #2 have adequately abated the following violations and addressed the concern cited in Ohio EPA's March 10, 2009 NOV Letter, and are hereby returned to compliance:

OAC Rule 3745-273-13(D)(1) Universal Waste Lamp Management

OAC Rule 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste

OAC Rule 3745-65-16(A)(B)(C) Personnel training

OAC 3745-65-16(D) Personnel training

OAC Rule 3745-273-13(D)(2) Universal waste management - standards for small quantity handlers of universal waste

OAC 3745-273-15(C) Accumulation time limits for Universal Waste

The Division of Hazardous Waste Management has created an electronic news service to provide you with quick and timely updates on events and news related to hazardous waste activities in Ohio. If you have not already, we encourage you to sign-up for this free service. You can find more information at the following Web link: <http://www.epa.state.oh.us/dhwm/listserv.html>

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

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: Natalie Oryshkewych, DHWM, NEDO
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