



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 14, 2011

Nilesh Patel
Ohio Circuits
2250 East Aurora Rd.
Twinsburg, Ohio 44087

**RE: OHIO CIRCUITS, OHD 004198412, SUMMIT COUNTY
COMPLIANCE EVALUATION INSPECTION/RCRA/CESQG/NOTICE OF
VIOLATION/RETURN TO COMPLIANCE**

Dear Mr. Patel:

On March 15, 2011, Ohio EPA's Division of Hazardous Waste Management (DHWM) performed a compliance evaluation inspection of Ohio Circuits located at 2250 East Aurora Road, in Twinsburg Ohio. At the time of this inspection, Ohio Circuits qualified as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. Ohio Circuits generates used oil and spent fluorescent lamps which are shipped off site for recycling.

The purpose of this inspection was to determine Ohio Circuits' compliance with Ohio's hazardous waste laws and regulations as found under the Ohio Revised Code and Ohio Administrative Code ("ORC" and "OAC" respectively). Ohio Circuits was represented by Gautam Natel, while Ohio EPA was represented by Sherry Slone and me.

Ohio EPA's inspection included an inspection of Ohio Circuits facility and a review of written documentation.

Based upon this inspection, Ohio EPA has determined that Ohio Circuits has violated the following state hazardous waste regulations:

1. **OAC Rule 3745-273-13(D)(1) Universal Waste Lamp Management:** *A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. **Such containers and packages must remain closed** and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.*

Ohio Circuits accumulates spent fluorescent lamps for recycling as universal waste lamps. At the time of this inspection, Ohio EPA observed at least ten (10) spent fluorescent lamps were being accumulated leaning against the wall in the screen room and another nine lamps in an open container and loose on a shelf in the chemical storage room.

Please see Violation #3 for abatement information.

2. **OAC Rule 3745-273-14(E) Labeling/marking of Universal Waste:** *Each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."*

At the time of this inspection, the spent lamps observed by Ohio EPA were not labeled with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

Please see Violation #3 for abatement information.

3. **OAC 3745-273-15(C) Accumulation time limits for Universal Waste:** *A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.*

At the time of this inspection, the Ohio Circuits did not have a system for tracking how long the universal waste lamps have been on site.

Upon being informed of these violations, Ohio Circuits placed the loose spent fluorescent lamps in a container, closed it, labeled it appropriately, and placed a date on the container for tracking of how long the lamps have been on site.

Ohio EPA therefore considers Violations #1, #2 and #3 abated.

4. **OAC Rule 3745-273-16 Employee Training for Small Quantity handlers of Universal Waste:** *A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility.*

Ohio Circuits has not trained employees responsible for the management of universal waste in the proper handling and emergency procedures appropriate to the type of universal waste handled at the facility. Ohio EPA has provided the facility with a copy of Ohio EPA's guidance on management of spent fluorescent lamps under the universal waste rules.

By fax dated April 12, 2011, Ohio EPA received training documentation demonstrating that employees involved in the management of universal waste have been appropriately trained in the management of that waste. Ohio EPA therefore considers this violation abated.

5. **OAC Rule 279-22C(1) Used oil requirements for generators:** *Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."*

At the time of this inspection, Ohio EPA observed one container of used oil which was not labeled with the words "Used Oil."

By e-mail dated March 16, 2011, Ohio EPA received documentation in the form of photographs, demonstrating that the used oil had been transferred to another container and labeled as "Used Oil." Ohio EPA considers this violation abated.

Enclosed you will find copies of the checklists completed at the time of the inspection.

Ohio EPA has the following comments:

- ☛ Ohio Circuits generates an ammonium based etchant that they ship to Micronutrients for disposal. In the past this material was shipped as a corrosive hazardous waste (D002). At Ohio EPA's suggestion, Ohio Circuits sent a sample of the etchant to be analyzed for corrosivity via SW846-9040C. Analytical results received at this office on March 29, 2011, demonstrate the waste is not a corrosive hazardous waste (pH =8.3), and is not subject to the container regulations or hazardous waste regulations in general, unless the process which generated this waste changes. Then it will be Ohio Circuits responsibility to recharacterize the waste stream to determine if it's a hazardous waste.
- ☛ Ohio Circuits generates acidic rinse waters from its processes which are shipped to Agmet for continued use in its processes. These rinse waters are exempt from regulation because they are reused for their acidic properties in Agmet's processes and are never a waste. However, should Ohio Circuits choose to send the acidic rinse waters elsewhere, or ship them off site to a permitted facility to be disposed, it is Ohio Circuits responsibility to characterize the waste and determine if it is subject to hazardous waste regulations.

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.

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

Nilesh Patel
Ohio Circuits
April 14, 2011
Page 4

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Suzanne Prusnek".

Suzanne Prusnek
Environmental Specialist
Division of Hazardous Waste Management

SP:cl

ec: Natalie Oryshkewych, DHWM, NEDO, OEPA
Frank Popotnik, DHWM, NEDO, OEPA

cc: Marlene Kinney, DHWM, NEDO, OEPA

Send to Central Office



Ohio Environmental Protection Agency

For Ohio EPA use only

RCRA SUBTITLE C SITE

IDENTIFICATION/VERIFICATION FORM

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHD004198412		Website: (Optional)					
	Name: Ohio Circuits							
Site Location Information	Street Address: 2250 East Aurora Road							
	City, Town, or Village: Twinsbug		State: OH					
	County Name: Summit		Zip Code: 44087					
Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Nilesh		MI:	Last Name: Patel	
	Title:				
	Phone Number: 3304251555			Phone Number Extension:	
	E-Mail Address:				
	Fax Number:			Fax Number Extension:	
	Street or P.O. Box:				
	City, Town or Village:				
	State:			Zip Code:	

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner:				Date Became Owner (mm/dd/yyyy):				
	Durga Inc. DBA Ohio Circuits								
	Owner Type:	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Street or P.O. Box: 2250 East Aurora Road				Owner Phone #: 3304251555				
	City, Town or Village: Twinsburg				Country: USA Zip Code: 44087				
	State: OH								
	Name of Site's Operator:				Date Became Operator (mm/dd/yyyy):				
	Ohio Circuits								
	Operator Type:	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Street or P.O. Box: 2250 East Aurora Road				Operator Phone #: 3304251555					
City, Town or Village: Twinsburg				Country: USA Zip Code: 44087					
State: OH									

VIOLATIONS CITED? Yes No

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input type="checkbox"/> Large Quantity Generator (LQG)
<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)	<input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator
	<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED)

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Name of Inspector(s)
Suzanne Prusnek

Name of Inspector(s)
Sherry Slone

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
03/15/2011 9:00

Comments:

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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TREATMENT OF HAZARDOUS WASTE

4.	Does the generator treat hazardous waste in a:	
	a. Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>