



**Environmental  
Protection Agency**

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

May 12, 2011

**RE: PROVIA DOOR  
LARGE QUANTITY GENERATOR  
OHD 091 628 602 / HOLMES COUNTY  
COMPLIANCE EVALUATION INSPECTION  
RETURN TO COMPLIANCE**

Mr. Chad Yoder  
ProVia Door  
2150 State Route# 39  
Sugar creek, OH 44681

Dear Mr. Yoder:

Thank you for your May 6, 2011 response to Ohio EPA's April 13, 2011 Notice of Violation letter. The documentation you submitted for each of the violations is as follows:

1. An explanation regarding the computer parts observed outside the building. According to your communication, these were not being discarded, but were staged awaiting pickup for recycling.
2. A manifest (007631888JJK), dated March 16, 2011, for the transport of the drum of xylene waste observed in the maintenance area.
3. A sign-in sheet for training given March 16, 2011.
4. A sign-in sheet for the 2009 training and a description of corrective actions to ensure training is held annually in accordance with the hazardous waste regulations.
5. A manifest (007626137JJK), dated March 16, 2011, for the transport off-site of the spent lamps observed in the maintenance area. Also included was a photograph of the waste lamp storage area showing lamps in containers adequate to prevent breakage and closed.
6. A photograph of the universal waste labels affixed to the boxes holding the spent lamps. The box was dated to ensure the universal waste will not be accumulated in excess of one year. In your communication, you stated this area has been added to your weekly inspection list.
7. A photograph of the metal drum used to accumulate used oil with a "Used Oil" label.
8. A copy of the land disposal restriction form for the xylene waste profile #033786 and a copy of the corrected manifest, 007626137JJK, dated August 18, 2010.

My review of this documentation reveals that ProVia Door has now abated the violations discovered during the April 13, 2011 inspection as listed below.

Letter Citation #	Rule Citation
1.	OAC Rule 3745-52-11, Waste Evaluation
2.	OAC Rule 3745-52-34(A)(3), Accumulation Time (Hazardous Waste)
3.	OAC Rule 3745-65-16(C), Personnel Training

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4.	OAC Rule 3745-65-16(D)(4), Personnel Training Requirements
5.	OAC Rule 3745-273-13(D), Universal Waste Management Standards
6.	OAC Rule 3745-273-14(E), Labeling/Marking Standards for Universal Waste
7.	OAC Rule 3745-279-22(C), Used Oil Storage Requirements for Generators (labels)
8.	OAC Rule 3745-270-07(A)(2), Testing, Tracking, and Recordkeeping Requirements for Generators

**Comments:**

Regarding violation #2, ProVia Door provided a generator copy of the manifest for the waste xylene transported by Chemical Solvents, dated March 16, 2011. Please ensure ProVia's receipt of the destination facility signature copy that is required for your records.

For your information, in accordance with **OAC rule 3745-273-16, employee training for small quantity handlers of universal waste**; a small quantity handler of universal waste (ProVia) shall inform all employees who handle or have responsibility for managing universal waste. The information shall describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. Information with regard to managing universal waste can be found at: <http://www.epa.ohio.gov/dhwm/universalwaste.aspx>.

Thank you and Mr. Beckley for your cooperation with the March 9, 2011 Compliance Evaluation Inspection of ProVia Door. If you should have any questions, please feel free to contact me at (330) 963-1279.

Sincerely,



Patricia M. Natali  
Environmental Specialist  
Division of Materials and Waste Management

PMN/cl

cc: Marlene Kinney, DMWM, NEDO

ec: Frank Popotnik, DMWM, NEDO  
Natalie Oryshkewych, DMWM, NEDO

Sherry Slone, DMWM, NEDO  
Jeff Mayhugh, DMWM, CO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with applicable regulations.