



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 24, 2007

RE: RITRAMA
CEI – LQG
OH0 000 072 173
MAHONING COUNTY
PARTIAL RETURN TO COMPLIANCE

Robert Hall
Ritrama Corporation
341 Eddy Rd.
Cleveland, OH 44108

Dear Mr. Hall:

Thank you for your March 27, 2007 response to Ohio EPA's March 6, 2007 Notice of Violation. It was received by this office on March 29, 2007.

The letter and documentation you submitted has been reviewed by Ohio EPA and it has been determined that it is sufficient to abate the following violations:

**1. Personnel Training Requirements
OAC 3745-65-16(A)(1) and (A)(2)**

(A)(1) *Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste requirements...*

(A)(2) *[Personnel training] shall include instruction which teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed*

**2. Personnel Training Requirements
OAC 3745-65-16(C)**

**4. Labeling of Containers (Satellite Accumulation)
OAC 3745-52-34 (C)(1)(b)**

**5. Content of Contingency Plan– Emergency Equipment
OAC 3734 65-52 (E)**

**6. Land Disposal Restrictions
OAC 3745-270-07 (A)(3)(a)**

**7. Labeling/Marking Standards for Universal Waste
OAC 3745-273-14(E)**

**8. Accumulation Time for Universal Waste
OAC 3745-273-15**

The following violation remains outstanding:

3. **Personnel Training (Job Descriptions)**
OAC 3745-65-16(D)(2) and (D)(3)

(D)(2): *The owner or operator shall maintain the job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job;*

*A written job description for each position [related to hazardous waste management] that includes **the requisite skill, education, or other qualifications**, and duties of personnel assigned to each position;*

(D)(3): *The owner or operator must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position [related to hazardous waste management];*

The job descriptions you submitted did not include **the requisite skill, education, or other qualifications** required for persons filling each position.

To abate this violation, you must, **within 15 days** of the date of this letter, submit job descriptions that include this information.

Failure to list specific deficiencies in this communication does not relieve Ritrama Corporation from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

cc: Natalie Oryshkewich, DHWM, NEDO
ec: Frank Popotnik, DHWM, NEDO
Robert Almquist, DHWM, NEDO
Harry Sarvis, DHWM, CO